Attachment 2

Safety Highlighter
Outline - OP-1742A
(For Routine Injuries/Incidents)
See Note Below

Today's Date:	Date of Incident:	Supervisor Name:
Injured Person(s)		
Investigation Date:	Time:	Work Area:
Investigation Team		
Injury/Incident Description:		
Equipment involved in injury/incident:		
Other key information (process conditions; procedures; temperature; pressure; etc.)		

NOTE: Providing the information on Safety Highlighter Outline Form OP-1742A or OP-1742B to the Safety Team will allow the Safety Team to produce the Safety Highlighter. Form OP-1742A can be used for routine injuries/incidents and Form OP-1742B can be used for more complex injuries/incidents. Computerized forms are available in OPDMS.

Attachment 2
(Continued)

Immediate Cause of Injury/Incident:		
Root Cause(s):		
Corrective Action(s)	Responsible Person(s)	Due Date:
Lesson(s) Learned: **See Example on Pages 4 & 5**		

Tailgate Meeting Held: Date _____ Supervisor _____

Attendees: _____ _____ _____

Distribution: Original Copy - Central Files

Attachment 2
(Continued)

Safety Highlighter
Outline - OP-1742B
(For More Complex Injuries/Incidents)
See Note Below

I. **THE NATURE OF THE INCIDENT** Briefly describe the incident. This includes answering the who, what, where, when and why of the incident. Do not use names, but use titles like operator, mechanic, etc. Note when the investigation was held.

II. **DETAILS OF THE INCIDENT (OPTIONAL-DEPENDING ON INCIDENT SIZE)** - Outline specific details of the incident including process conditions, equipment numbers, sequencing, temperatures, alarms, etc. Leading up to the beginning of the incident (Basically a chronological account of these events).

III. **INCIDENT CAUSE** - This section should list the primary and secondary causes found as a result of the investigation. This section should also answer the questions what happened and why did it happen (the causes). The primary causes should include those where the following are directly involved, machinery, materials, human activity and communications. The secondary causes should include items such as lack of training, lack of preventive maintenance, failure to use proper equipment for the job or faulty procedures. Also, list the team members attending the investigation (to be held within 48 hours of the incident).

Attachment 2
(Continued)

IV. **CORRECTIVE ACTION** - Describe the immediate and long range solutions necessary to either prevent or reduce the chances of the same or a similar incident from happening in the future.

V. **LESSON LEARNED** - List or describe the significant findings learned as a result of a review of the incident and investigation.

VI. **FOLLOW-UP RESPONSIBILITY** - List the person or persons responsible to see that the above corrective actions are completed. Also, list the estimate target date for the completion of the corrective action item.

NOTE: **Providing the information of Safety Highlighter Outline Form OP-1742A or OP-1742B to the Safety Team will allow the Safety Team to produce the Safety Highlighter. Form OP-1742A can be used for routine injuries/incidents and Form OP-1742B can be used for more complex injuries/incidents. *Computerized forms are available in OPDMS.***

Attachment 3

Safety Scoreboard Procedure

When an injury, other than an "Unclassified" one (defined in Section 3.0), has occurred, as soon as possible, the immediate supervisor of the injured employee must do the following before completing duties for the shift in which the injury occurred:

1.1 Complete GO-42 – as much as possible with the available information; see Section 2.1 and Attachment 4 of this document. Deliver preliminary copies of the GO-42 to the offices of line supervision, the Safety Department, and the Americas Regional Manager within 24 hours following the injury.

1.2 During weekdays and non-holidays from 7:00 a.m. to 4:30 p.m., contact the Safety Department to arrange with Security to have the Amber light turned on at both safety signs (Gates 1 and 3). Otherwise, contact Security directly to have the Amber light turned on at both safety signs. The supervisor should note in the turnover that this call was made. The Amber light indicates an employee injury has occurred. The green light is to remain on when the Amber light is turned on. Classification of the injury as a First Aid, or OSHA Recordable injury is handled by the Safety Department using Company and Bureau of Labor Statistics (BLS) guidelines. OSHA Recordable injuries are further broken down into:

1) cases without lost workdays, including restricted duty cases
2) cases with lost workdays, and
3) fatalities

See Section 3.0 for complete definitions.

1.3 The Safety Department will notify Security to change the safety sign light to Red if the accident is determined to be an OSHA Recordable Lost-Workday injury. When the red light is turned on, the green light and amber light will be turned off.

NOTE: A lost workday is when an employee cannot report for his/her next regularly scheduled work shift. This is shown on the Safety Scoreboard with a red light.

1.5 It is possible that two lights (Amber and Red) may be lit at the same time if we have a First-Aid or an OSHA Recordable non-lost workday or restricted duty injury and an OSHA Recordable Lost-Workday injury at the same time.

1.6 The Red off-the-job Lost-Workday injury light shall be turned on when an employee fails to report to work because of a Lost-Workday injury away from work. On the first lost workday, it is the responsibility of the immediate supervisor of the employee to contact the Safety Department to arrange with Security to have the Red off-the job Lost-Workday injury light turned on at both safety signs (Gates 1 and 3). This applies during weekdays and non-holidays from 7:00 a.m. to 4:30 p.m. In addition, notify the Safety Department of the details of the injury. Use procedure outlined in 1.2 above for light changes on weekends, holidays, and off-hours. The Safety Department will have the light turned off 72 hours after the lost workday began.

1.7 Updating of the current safe workday number and the previous safe workday record at Gates 1 and 3 will be handled by Security and audited by the Safety Department. The Safety Department will update the figures on the Safety Scoreboard in the small conference room Monday through Friday on all regular workdays.

Attachment 4
GO-42

Employer's Report of Occupational Injury or Illness

ChevronTexaco

Classification

- ☐ Fatality
- ☐ Lost Workday
- ☐ LW Restricted Duty
- ☐ Other Recordable Cases (former OSHA Medical or Illness w/o LW)
- ☐ First Aid
- ☐ Industrial Non-Recordable
- ☐ Non-Industrial Non-Recordable
- ☐ MSHA

Injury/Illness Type

- ☐ Injury
- ☐ Skin Disorder
- ☐ Respiratory Condition
- ☐ Poisoning
- ☐ All other illnesses

- ☐ Log Entry Complete
- ☐ Privacy Concern Case

LPS Incident No./OSHA Case No. _____

Every work injury to an employee which causes disability lasting longer than the day of the injury or which requires medical services other than first aid treatment must be reported within three days after the injury. If the incident results in death, a report must be made by phone or fax to the Home Office no later than 8 hours after the death.

EMPLOYER

Company Name	Co	Dept	Div	Loc	Org Code
Company Mailing Address (Please include city, zip)					
Location, if different from Mailing Address				AFIS/SAP Cost Center	
Nature of Business (e.g. Mktg, Mktg OP, E&P, Research, Finance, IT)				State Unemployment Ins. Acct. No.	

EMPLOYEE

Name	Social Security Number	Date of Birth (MM/DD/YYYY)
Home Address (number, street, city, state, zip)		Date of Hire (MM/DD/YYYY)
Gender ☐ Male ☐ Female	Occupation (regular job title, not specific activity)	Department/Division in which regularly employed
Employment Status ☐ Regular ☐ Seasonal ☐ Casual ☐ Part Time		How long in present job?
Gross Wages/Salary Employee Earns per ☐ Hour ☐ Day ☐ Week ☐ Every Two Weeks ☐ Month		

INJURY OR ILLNESS

Where did incident or exposure occur? (number, street, city, state, zip)	County	On Employer's premises? ☐ Yes ☐ No
Specific site of event. (Examples: loading dock north end, sw corner of platform, business office, tank farm-tank #3)		
What was the employee doing just before the incident occurred. (Describe activity, as well as the tools, equipment, or material being used. Examples: climbing a ladder while carrying roofing material, spraying chlorine from hand sprayer, daily computer key-entry.)		
What happened? How did the injury occur? (Examples: when ladder slipped on wet floor, worker fell 20 feet; worker developed soreness in wrist over time.)		
What object or substance directly harmed the employee? (Examples: concrete floor, deck grating, chlorine, heavy boxes, tongs)		
Describe the specific injury or illness (e.g. cut, strain, fracture, skin rash, etc.)	Body part(s) affected (e.g. back, wrist, eye, etc.)	
Name, address of Health Care Provider Phone No.	Name, address, of Facility where treatment given. Phone No.	

Date of Injury or Onset of Illness (MM/DD/YYYY)	Time of event or exposure ☐ AM ☐ PM	Time employee began work ☐ AM ☐ PM	Did Employee lose at least one full shift's work? ☐ No ☐ Yes, first date absent _____ (MM/DD/YYYY)
Date Employer notified of Incident (MM/DD/YY)	To whom reported Employee ID	Treated in emergency room? ☐ Yes ☐ No	Hospital inpatient overnight? ☐ Yes ☐ No
Has Employee returned to work? ☐ No, still off work ☐ Regular Work ☐ Restricted Work ☐ Yes, date returned _____		Did Employee die? ☐ No ☐ Yes, date _____	
Date Employee provided w/Workers' Comp Claim Form (MM/DD/YY)	Other workers injured/made ill in this event? ☐ Yes ☐ No	TSCA 8 (c) allegation? ☐ Yes ☐ No	Names of witnesses (if any)
Reviewed by (name of Manager reviewing report) Employee ID	Title		Date (MM/DD/YY)

Filing of This Report is Not an Admission of Liability

Attachment 4 (Continued)

Accident Analysis

To be filled out after completing the accident investigation.

Note: If an accident analysis has been performed using a technique such as Why Tree, TapRoot, etc., attach a summary of the report and skip sections I, II, IV, V.

I. List the sequence of events which led up to the accident

II. Check the Cause or Causes of the accident:

- ☐ Procedure incorrect
- ☐ Procedures not used
- ☐ Procedures followed incorrectly
- ☐ Procedures not enforced
- ☐ Misunderstood verbal communications
- ☐ Improper or incomplete turnover
- ☐ Improper guarding
- ☐ Improper installation
- ☐ No training
- ☐ Training not understood
- ☐ Worker/machine interface less than adequate
- ☐ Component, part or equipment defective
- ☐ Poor housekeeping, lighting or work environment
- ☐ No standards, policies or controls
- ☐ Standards, policies or controls not used
- ☐ No inspection or inadequate inspection
- ☐ Inadequate maintenance/testing
- ☐ No audits, evaluations, or feedback
- ☐ Lack of direct supervision
- ☐ Inadequate job planning, or scheduling
- ☐ Unqualified worker
- ☐ Procedures deliberately not followed
- ☐ Independent action of the employee
- ☐ Management of change not used
- ☐ Inadequate materials handling/storage
- ☐ Inadequate design
- ☐ Other
- ☐ No corrective action or not fully implemented from previous accident

III. RSI Root Cause tracking categories (Check all that apply)

Risk Assessment and Initial Awareness

- ☐ Workwell/other assessment/awareness tool not available.
- ☐ Injury had progressed beyond early discomfort when completed.

Training

- ☐ Specialized training based on risk level not available.
- ☐ Employee did not receive/comprehend specialized training.
- ☐ Supervisor did not receive/comprehend specialized training.
- ☐ Appropriate admin controls were not used to limit exposure.
- ☐ Mgmt did not support and encourage early reporting of discomfort.
- ☐ All Rapid Response recommended prevent. actions were not taken.
- ☐ Rapid Response was not initiated
- ☐ Work procedures recommended by CWE or QWE were not followed.

Other Factors

- ☐ Previous injury.
- ☐ Non-work related activities/conditions.
- ☐ Employee/supervisor did everything that RSI Prevention Plan required but early discomfort still progressed to Recordable condition.

Preventative Measures Based on Risk Category

- ☐ Appropriate admin controls were not used to limit exposure.

Behavioral Safety Process

- ☐ Employee was not active in a behavioral safety program.

Early Reporting of Discomfort & Rapid Response Intervention

- ☐ Mgmt did not support and encourage early reporting of discomfort.
- ☐ All Rapid Response recommended prevent. actions were not taken.
- ☐ Work procedures recommended by CWE or QWE were not followed.

IV. What control, barrier, or prevention measures should have been in place to prevent this type of accident?

V. Corrective Action: What control, barrier or prevention measure will be put in place to prevent this type of accident?

VI. Follow-up Action: What action will be taken to verify the corrective action is implemented?

VII. Corrective Actions Target Date (MM/DD/YYYY)	Responsibility of
Date Corrective Actions Completed (MM/DD/YYYY)	Corrective Actions Completed by
VIII. Reviewed by (Second Level Supervisor) Date	GO-42 Prepared/Completed by Date

For Local Use:

Investigative Team Members:

Distribution: Return completed original to _____ at _____

Attachment 5
OP-1710
Oak Point
Investigation Report for
Non-Injury Related Incident or Near Miss

Incident:

Date and time of incident:

Date and time investigation began:

Unit/area:

Description of what happened:

Investigation (Include supplementary sheets, sketches, P&ID's, and photos as required.):

Attachment 5
(Continued)

Basic cause:

Corrective action:

Follow up required? Yes or No

Person responsible for follow up:

Investigation team:

Prepared by:

(Route to Safety Department for filing.)

Attachment 6
OP-1711

Contractor's Report of Occupational Injury or Illness

Classification
Lost Workday LW Restricted Duty
OSHA Medical First Aid

EMPLOYER

1. Firm Name

2. Mailing Address (Please include city, ZIP)

3. Location, if different from Mail Address

EMPLOYEE

4. Name

5. Social Security Number
___/___/___

6. Home Address (number and street, city, ZIP)

7. Sex
Male Female

8. Occupation (regular job title, not specific activity at time of injury)

9. Date of Birth
___/___/___
Month Day Year

10. Department in which regularly employed

10A. Date of Hire
___/___/___
Month Day Year

Type Employee:
Regular Seasonal Casual
Part Time

10B. How long in present job?
Less than 3 mos._____ 3 mos. to 6 mos._____
6 mos. to 2 yrs._____ Over 2 yrs._____

Gross Wages/Salary Employee earns: $ hour day week every two weeks month
_____per

INJURY OR ILLNESS

11. Where did accident or exposure occur? (number and street, city)

11A. Parish

12. What was Employee doing when injured? (Please be specific. Identify tools, equipment or material the employee was using.) **If additional space is required, use reverse side.**

13. How did the accident or exposure occur? (Please describe fully the events that resulted in injury or occupational disease. Tell what happened and how it happened.) **If additional space is required, use reverse side.**

14. Object or substance that directly injured Employee (e.g. the machine employee struck against or which struck him, the vapor or poison inhaled or swallowed; the chemical that irritated his skin; in case of strains, the thing he was lifting, pulling, etc.)

15A. Describe the injury or illness (e.g. cut, strain, fracture, skin rash, etc.)

15B. Part of body affected (e.g. back, left wrist, right eye, etc.)

16. Name and address of Physician

17. If hospitalized, name and address of hospital

18. Date of injury or illness
___/___/___
Month Day Year

19. Time of day
_____ a.m.
_____ p.m.

20. Did employee lose at least one full day's work after the injury?
Yes, first date absent ___/___/___ No
Month Day Year

21. Has Employee returned to work?
Regular work Restricted work
Yes, date returned ___/___/___
Month Day Year
No, still off work

22. Did Employee die?
Yes, date ___/___/___ No
Month Day Year

23. Date Employer notified Chevron
___/___/___
Month Day Year

24. To whom reported

25. Witnesses:	Witnesses:	Witnesses:
Name of witness:	Name of witness:	Name of witness:
Address of witness:	Address of witness:	Address of witness:
Phone number of witness:	Phone number of witness:	Phone number of witness:
Name of Employer:	Name of Employer:	Name of Employer:

Prepared by (foreman, site manager, etc.)	Title	Date
Signature of Injured Party		Date

Attachment 7

Formal "Level I" Incident Investigation Procedure (Mandatory "Why Tree" Root Cause Analysis)

OBJECTIVE

Formal investigating and reporting of "Level 1" health, safety and environmental incidents are necessary to prevent recurrence. This is done by identifying and correcting those conditions and/or practices that led to or could have led to undesirable consequences, and communicating findings to others who may benefit from them.

SCOPE

This procedure applies to any "Level 1" incident at the plant. See Section 3.0 for definition of Incident and Criteria for Levels 1 and 2 incidents. Also, see Attachment "8" entitled "Why Tree Incident Investigation Matrix" for additional details. Incidents that involve contractors and visitors are included. Incidents that occur off-site are not covered. See ERM 6.6 for handling of "Off-Site" emergencies.

RESPONSIBILITY

When an incident has occurred, it is the responsibility of the affected First-Line Supervisor to promptly (but no later that 48 hours following the incident) begin a thorough investigation.

INVESTIGATION PROCEDURE

The following procedure is to be initiated and coordinated by the affected First-Line Supervisor immediately following the incident:

- Initiate short-term corrective actions to secure the equipment and people in the immediate area of the incident.
- Flag off the area of the incident so that no incident data is disturbed and begin the initial investigation process as follows:
  - Identify and interview as many witnesses as possible (some of the interviews may have to wait until the team is formed).
  - Make sure it is emphasized that the purpose of the investigation/interviews is not to place blame. It is a fact finding and not a fault process.
  - Contact the Safety Team to assist in the interviewing process, if necessary.
  - Make sure written statements are obtained from witnesses and that all interviews are documented.
- Form a "Why Tree" root cause analysis investigation team for the purpose of developing a timeline, gathering incident data and determining the root cause(s) of the incident as outlined below. Team members shall include:
  - Someone trained in the "Why Tree" method to facilitate. The Safety Team will assist, if requested.
  - Employees (including contractors) involved in the incident, as approved by Second Level Supervision.

Revisions are shown by R and { Text. }

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Attachment 7
(Continued)

- First Level Supervisor or person in charge of the initial investigation.
- Based on the nature, magnitude and complexity of the incident, other team members may include
  - ♦ A Safety Team member (for fires, explosions, injuries or illnesses)
  - ♦ Another Supervisor
  - ♦ An Operator
  - ♦ A Mechanic
  - ♦ A Process Engineer
  - ♦ Others as appropriate
- Normally, it is not necessary for second level supervision or higher to be part of the investigation team.

• Develop a time line which is a chronological summary of factual events occurring prior to the event through termination of the emergency.

• Arrange for the team to gather incident data and interview any witnesses to the incident. This may include video taping, snapshots, samples, measurements, etc. Also, include a sketch of the incident site and P&ID's as available.

• Arrange for the economic impact to Chevron Oronite to be determined as part of the investigation. The economic impact includes both direct costs (repairs, parts and labor, product lost due to disposal, overtime costs, substandard production, Workman's Compensation, rework costs, waste disposal, etc.) and lost production opportunities.

• Complete the formal "Why Tree" root cause analysis process.

• Make sure corrective actions and lessons learned are covered as part of the investigation process.

- The corrective actions are an important part of the investigation process and must address/resolve the root cause. Assignments for follow-up and estimates of follow-up completion are to be provided by the investigation team. Examples of items that are not corrective actions include statements such as:

  1. I closed the valve
  2. I fixed the pump
  3. I told him not to do it again.

- Each incident should be viewed as an opportunity to learn more about our business. It is not a "witch hunt" but a method of identifying weaknesses in our systems so we can correct them.

• Record the details of the investigation on the required reports as outlined in ERM 6.9, Section 2.1. Several reports are detailed in attachments 5, 6 and 7 of ERM 6.9. Forward all signed/approved reports and attachments directly to the Safety Team for permanent record filing of the incident.

• As a team, decide how to share the results of the investigation with all plant personnel. As an example, a Safety Highlighter can be used. Crew meetings may be required in some cases. Make sure positive findings of the investigation, as well as opportunities for improvement, are noted in the highlighter.

• The investigation team shall provide follow-up to the corrective actions until all are complete. Make sure specific assignments with projected due dates are assigned to each corrective action item.

Revisions are shown by R and { Text. }

Uncontrolled Document

APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
SAFETY SPECIALIST	HEALTH & SAFETY SUPERVISOR	AMERICAS REGION MANAGER
S. J. STUNTZ	G. A. CREEKMORE	M. H. BURNSIDE

DISTRIBUTION

HARD COPY

13 Controlled Copies — ERM Reference Manual Distribution List

Hard Copies, other than those listed in the Distribution List above, shall be considered uncontrolled copies and will not be updated.

OPDMS

All networked personal computers shall have access to the most current version of this Procedure in accordance with PI-111, "Control of Quality Assurance Related Documents and Procedures."

1.0 Introduction/Scope

This plan outlines the procedures to be used during an emergency release of a hazardous chemical. This plan is to be used with the Oil Spill Response Plan (USCG), the Facility Response Plan (EPA), and the Spill Prevention Control and Countermeasure Plan (SPCC). Copies of the Oil Spill Response Plan (USCG) and the Facility Response Plan (EPA) are in the Compliance Department's files and in the BS&U Operating Area Supervisor's office, and the SPCC {Plan} are in the Compliance Department's files and in all wharf manuals.

This plan directs the action that company personnel must take to comply with Local, State and Federal laws when an unpermitted hazardous chemical release occurs.

NOTE: There are two basic response plans:
EPA - deals primarily with plant spills and
USCG- deals primarily with the wharf area and spills to the river (see definition section).

2.0 Procedure

2.1 Responsibility

Oak Point handles many chemicals that meet the OSHA definition of a hazardous chemical. These chemicals are in all operating areas. Every employee must:

1. Be aware of the chemicals stored in their respective areas,

2. Be familiar with their corresponding Material Safety Data Sheets (MSDSs), and

3. Take responsibility to prevent unpermitted releases {by} ensuring that adequate preventive maintenance and good work practices {and procedures} are followed.

   If a question arises about the potential hazard of any chemical, contact your supervisor or the Compliance Department. Further details can be found in PI-724, Hazard Communication Standard.

2.2 Spill/Release Response

If a hazardous chemical release occurs, it is imperative to react as quickly as possible to minimize any potential hazards to plant personnel, the community, and the environment and to notify the appropriate government agencies immediately. See Section 2.3 for reporting guidelines. Releases may occur by liquid or solid spills and by discharge of a gas, vapor or particulates to the air. Refer to the appropriate MSDS, PI-714 and PI-721 for proper protection during response and clean-up operations.

Spill/Release within the Plant

1. Plant Spills/Release to Unpaved Land - All significant spills (greater than ten gallons or 100 pounds) within the plant should be recovered or contained using a combination of sandbags, absorbent materials, and vacuum trucks. Remember, not all solids are compatible with water (i.e., P_2S_5). For P_2S_5, use brooms or shovels to cleanup and, if not recoverable, dispose as a hazardous waste.

   Sandbags are in the South Drum Storage Shed (3 pallets).

   Absorbent materials are in the following areas:

a) Wharf Control House - 300#'s
b) North Chemical Warehouse - 1,000#'s
c) Stormwater Impoundment Basin
d) Spill Response Kits

Spill Response Kits are in the following locations:

a) Wharf
b) Tank Truck Load Facilities
c) Warehouse Annex

The portable building on the east side of the stormwater impoundment basin contains additional spill response material. Use this material to supplement the kits for a larger spill.

Oak Point maintains vacuum trucks in the plant. The total holding capacity is 3,000 gallons/truck. Load time will vary depending on the material and its viscosity.

If additional material or equipment is necessary, see Section 2.4.

All materials used in containing a plant spill/release to unpaved land must be replaced as soon as possible. Those materials that cannot be decontaminated for reuse shall be stored in covered buggies until the Environmental Team determines the proper disposal option. The Area Shift Supervisor where the spill occurred is responsible for replacing all sandbags and absorbent materials used. Use a work order to replace any sandbags and a GO-111 to replace any absorbent materials.

If a plant spill/release to unpaved land greater than 42 gallons occurs, the BSU&E Shift Supervisor shall be notified to begin implementing the Oil Pollution Act (OPA-90) EPA Facility Response Plan.

2. Minor Air Release - Chevron's State air permits cover plant operations involving release of chemicals to the air including operation of the incinerator, boilers, hot oil unit, tank and fugitive emissions. The emissions from these facilities are permitted. All other air emissions or releases to air are covered by this procedure.

A minor release may be discovered based on an Oak Point Helpline telephone call or an odor complaint from within the plant. When this occurs, the information from the Helpline call or internal complaint will be noted, along with any other pertinent information, on the Helpline/ Environmental Concern form (Attachment 2) by the BSU&E Shift Supervisor. The BSU&E Shift Supervisor will investigate the incident along with a second operating area Shift Supervisor.

Unpermitted air releases can be categorized as either minor or having the potential to leave plant boundaries. In both cases, all reasonable efforts shall be used to stop the emissions. Minor releases may be the result of a process upset or leak in which the air emission is small and there is no effect past the plant fenceline. The source of the emission should be found, the cause identified, and corrective action taken by the responsible operating area. Other personnel should stay clear of the

The investigation team will record their findings on the Helpline/Environmental Concern form and either forward it to the responsible area or return it to the Compliance Department if no source could be located. If the source of the release is identified, reasonable efforts shall be made to repair or curtail emissions as soon as possible. The "fixes" made or reason for not making them shall be documented on the form by the responsible area supervisor. The responsible area supervisor or BS&EU Shift Supervisor shall send the

form to the Environmental Department within three days of the incident. The Environmental Department will review the information and determine if any further action is needed.

3. Spills on the Wharf Within its Containment System - The wharf has a four-inch concrete retaining wall. All liquid contained by the wall drains to a collection sump for pumping to the wastewater treatment system. A level control system starts the pump. The spill should be thoroughly cleaned up. No reporting is required as long as the spill stays within the containment area and does not get into the air or the water.

Release with the Potential to Escape Plant Boundaries

1. Release to the River - It is vital that any significant release be contained as quickly as possible. A significant release is any spill of oil or hazardous chemicals that:

   a) Creates a sheen on the river - even a minor one along the bank,
   b) Exceeds 42 gallons, **OR**
   c) Has the potential for harming the environment.

   Upon identifying a significant release to the river and after notifying plant personnel, notification at the direction of the area Shift Supervisor should be made immediately to the Coast Guard, as specified in Section 2.3, and the Response Contractor as specified in Section 4.4 of this procedure.

   If a release to the river occurs, the Oil Pollution Act of 1990 Oil Spill Response Plan (USCG) shall then be implemented.

2. Release to the Air - When a release to the air poses a threat past the plant fenceline, response shall begin immediately. The release must be evaluated to determine likely impact on plant neighbors and traffic on Highway 23. The release may only cause odors which may not be a health threat. Other more serious releases may require us to ask the Plaquemines Parish Sheriff's Office to stop highway traffic, shelter local residents in place, or evacuate members of the community. Refer to ERM-6.6, Off-Site Emergencies for guidelines and for the list of chemicals which could pose this type of threat.

   a) Incinerator Shutdown (S/D) - The incinerator's State air permit does not allow for a S/D of either Phase I or Phase II without first shutting down all reactors that generate H_2S within the plant. Immediately notify agencies specified in Table 4.3 for Hydrogen Sulfide or Sulfur Dioxide releases *greater than the reportable quantity*.

      Phase II + Incinerators Go Down - Unpermitted SO_2 is released from F-5251 (the bypass stack). If the temperature falls below 558°F and H_2S is still being generated, then H_2S is released.

      Only Incinerators Go Down - As long as draft is maintained to prevent emissions from F-5251, no unpermitted release occurs. If the draft is not maintained then SO_2 is released from F-5251. If the temperature falls below 558°F and H_2S is still being generated, then H_2S is released from C-5290 (or F-5251 if draft is not maintained).

      Only Phase II Goes Down - Unpermitted SO_2 is released from F-5251. If the temperature falls below 558°F and H_2S is still being generated, then H_2S is released.

      To minimize the volume of SO_2 or H_2S released, the following steps should be taken:

      i) The BSU&E S/S must notify the plant by radio that the incinerators are down. He/She shall advise operating personnel in the Batch and Continuous area to

immediately shutdown their H_2S producing units or go on closed loop circulation, whichever is appropriate. No H_2S producing processes shall be started until the incinerators return to service.

ii) Determine the amount of SO_2 or H_2S being emitted from the column or bypass stack using the forms in Attachment 3. Calculate the emissions and provide this information to the agencies during notification (per Section 2.3).

iii) Restart Incinerator & Phase II ASAP.

b) Other air releases such as a line rupture or relief valve venting to atmosphere – Oak Point's State air permit allows for air emissions from routine operations (i.e., boiler or hot oil furnace firing, storage tank or loading emissions, fugitive emissions, etc.) The air permit does not allow for emergency or accidental releases. For any release to the air that is not covered by the air permit, consult Section 2.3 for the reportable quantity and the government agencies that must be notified within one hour. If in doubt, seek help immediately from an Environmental Team representative or do a preliminary report to the agencies and then obtain Environmental Team assistance.

2.3 Release Reporting Requirements

A reportable release occurs whenever a chemical is released to the environment in amounts greater than the reportable quantity (listed below) over a 24-hour period. This includes plant spills that go into the air. The following is a list of the most commonly handled chemicals within the plant and the agencies that must be notified immediately.

NOTE: By notifying the LA State Police, the Louisiana Department of Environmental Quality is notified immediately. NRC stands for the National Response Center in Washington, D.C.

General Reporting Requirements

Material Released	Agencies to Notify	Reportable Quantity	Hazardous Chemical(s)
Compressed or Refrigerated Gases with Flashpoints Below 100 °F (i.e.,Acetylene Cylinders)	LA State Police	100 lbs.	N/A
Materials with Flashpoints Below 100 °F	LA State Police	100 lbs.	N/A
All other Liquids Requiring an MSDS	LA State Police	500 lbs.	N/A
All Solids Requiring an MSDS	LA State Police	5000 lbs.	N/A
Oil (See notes "A" and "B" below)	LA State Police	42 gals.	N/A

NOTES: A) Oil is defined as a liquid (or material that is a liquid upon heating) and that:
1) Can be burned and
2) Is not soluble in water

B) More restrictive reporting requirements for spills to the Mississippi River are outlined in Document ERM-6.13 entitled "Oil Spill".

Revisions are shown by R and { Text. }

Specific Chemical Reporting Requirements

Plant Chemical Name	Agencies to Notify	Reportable Quantity	Hazardous Chemical(s)
Acetic Acid/Formic Acid	LA State Police, Parish, NRC	619 gals.	91.4 % Acetic, 8.6% Formic
Asbestos	LA State Police, Parish, NRC	1 lb.	Asbestos
Aromatic (OGA) Solvent	LA State Police, Parish, NRC	140 gals.	1% Cumene, 0.2% Ethylbenzene, 9.8% Xylene
N-Butanol	LA State Police, Parish, NRC	740 gals.	N-Butanol
Chloroformate	LA State Police, Parish, NRC	1,230 gals.	Contains < 0.1% Phosgene
Ethylene Diamine (EDA)	LA State Police, Parish, NRC	670 gals.	Ethylene Diamine
Ethylene Glycol	LA State Police, Parish, NRC	530 gals.	Ethylene Glycol
Hazardous Waste (Tetramer Purge, OGA Wastes)	LA State Police, Parish, NRC	1 gal.	Contains > 0.5 ppm Benzene
Hazardous Waste (Paint Wastes in Maintenance)	LA State Police, Parish, NRC	1 pint	Contains Cadmium, Chromium Non- Halogenated Solvents
Hazardous Waste (All Other)	LA State Police, Parish, NRC	13 gals.	Ignitability or reactivity
Maleic Anhydride (MA)	LA State Police, Parish, NRC	410 gals.	Maleic Anhydride
Methanol	LA State Police, Parish, NRC	760 gals.	Methanol
Monomethylamine (MMA)	LA State Police, Parish, NRC	17 gals.	Monomethylamine
OLOA 267 Alcohol	LA State Police, Parish, NRC	1,320 gals.	57% Isopropyl Alcohol
OLOA 2506M	LA State Police, Parish, NRC	130 gals.	10% Naphthalene
OLOA 2504R	LA State Police, Parish, NRC	6,670 gals.	1.2% Toluene
Paraformaldehyde	LA State Police, Parish, NRC	1,000 lbs.	Paraformaldehyde
Phenol	LA State Police, Parish, NRC	110 gals.	Phenol
Phosphorus Pentasulfide	LA State Police, Parish, NRC	100 lbs.	Phosphorus Pentasulfide
Sodium Hydroxide (Caustic)	LA State Police, Parish, NRC	160 gals.	50% Sodium Hydroxide
Sulfur Dioxide	LA State Police, Parish	500 lbs.	Sulfur Dioxide
Sulfur Trioxide	LA State Police, Parish	100 lbs.	Sulfur Trioxide
Sulfuric Acid	LA State Police, Parish, NRC	65 gals.	Sulfuric Acid
Xylene	LA State Police, Parish, NRC	14 gals.	Xylene

When a release meets or exceeds the Reportable Quantity, notify the listed agencies specified immediately (see Emergency Response Manual Emergency Telephone Numbers document for numbers) and the Area Operations Supervisor. The agencies, in particular the LA State Police, allow as little as 15 minutes and up to one hour for this reporting to occur after the release began. If Public Affairs is needed, their telephone number can also be found in the Emergency Response Manual Emergency Telephone Numbers document located behind the green tab in front of the Emergency Response Manual.

In the event of a release to the Mississippi River, the release must be reported immediately to the Coast Guard, our Release Response Contractor, the Plaquemines Waterworks, Chevron as described below, and the agencies in the table.

The 8th Coast Guard District New Orleans Pollution Control Office's 24-hour telephone number is 589-6261. The Control Office will request the following information:

a) River Mile: Mile 72 from the River Delta, West Bank
b) Address: 4 Miles South - Belle Chasse Highway 23
c) Cause of Release
d) Estimated Quantity Released
e) Type of Material Released
f) Clean-Up Measures (Spill Boomed/Not Boomed)
g) Who Will Do Additional Clean-Up (If Necessary): Rubark Environmental Services

Release Response Contractor - See Section 2.4 for instructions.

Plaquemines Waterworks - 682-0081 (24 Hours)

ChevronTexaco - For any marine incident (spill, wharf damage, injury, etc.,), ChevronTexaco Shipping Company (CTEIC) should be notified. See the ERM-0.2, Emergency Telephone Numbers document for the appropriate notifications.

The parties should be informed that the Coast Guard and, if necessary, a clean-up response team have been notified and are responding.

2.4 Release Response Contractor

ChevronTexaco contracts marine incident cleanup contractors for clean-up assistance. Refer to ERM-02, Section 1.0, Outside Services if clean-up help is necessary for a spill to the river. If there is no answer, a call-out sheet of personnel is located in the wharf office. If additional materials or equipment is necessary, see the ERM-0.2 document for specific listings. The marine incident cleanup contractor will require the following information:

Initial Data

Location of Incident: Oak Point Plant
Directions to site: 4 miles south of Belle Chasse, Highway 23
Type of Service Required: Immediate - use quickest means available to arrive at spill site.

Description of Release (Oil, Hazardous Chemical, quantity of material):

Additional Data

Type of Product (refined or crude oil, pesticide, chemical oxidizer, etc.):

Manufacturer of Product

Circumstances

Is product still leaking?
What are site conditions?
Fire at scene?
Weather (wind, visibility, river conditions - weather forecast)
Have local police, fire and emergency facilities been notified?
Responsible party for cleanup: Chevron Chemical
Billing Address: P.O. Box 70, Belle Chasse, LA 70037
Person to contact: BSU&E Shift Supervisor

2.5 Disposal Requirements

Disposal of Recovered Solids and Liquids - The disposal of recovered materials, whether hazardous or non-hazardous, shall be handled by the Environmental Department. Under no circumstances shall any recovered material be disposed of or removed from the plant without prior Environmental Department approval. In addition, the Environmental Department will have responsibility for providing the Louisiana Department of Environmental Quality with a written report documenting implementation of the emergency response plan, description of the incident, and compliance with the regulatory requirements for preparedness (LAC 33:V1513.F.8).

2.6 Release of Information

Refer to the Off-Site Emergencies tab of the Quick Reference portion of the Emergency Response Manual for guidelines on when to contact Public Affairs. Follow instructions in ERM-6.15, News Media Relations for additional information on handling the media.

3.0 Definitions

For this document, the following definitions apply:

EPA Facility Response Plan: Oil Pollution Act (OPA-90) EPA Facility Response Plan.

Environment: means air, unpaved land, surface water (i.e., Mississippi River or ditch along Highway 23), or groundwater.

Fugitive Emissions: means air emissions that do not come from a stack, vent, or other confined vent stream. These releases include equipment or piping leaks, evaporation from spills, and raw material and product loading and unloading losses.

Hazardous Chemical: as defined by OSHA, means any chemical which is a physical hazard or a health hazard. Always assume that every chemical is hazardous.

Plant Spill: means a spill of a liquid or solid (or a mixture) that:

- Does not get into the air;
- Occurs on a paved area within the plant fenceline (including the wharf diking);
- If it enters the stormwater system and is recovered in the oil/water separator

A plant spill is not a reportable release and no release reporting is necessary.

Release: means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into or on any unpaved land, air, surface water or ground water.

Reportable Release: means a release in a 24-hour period greater than the Reportable Quantity (the minimum specified by EPA, DEQ, or the LA State Police (see Section 2.3)).

USCG Oil Spill Response Plan: Oil Pollution Act of 1990 Oil Spill Response Plan.

4.0 References

Oil Pollution Act of 1990 (OPA-90) Oil Spill Response Plan (USCG), Oak Point, LA Plant

Oil Pollution Act of 1990 (OPA-90) EPA Facility Response Plan, Chevron Oronite Company LLC, Oak Point Plant

Spill Prevention Control and Countermeasure Plan (SPCC); Chevron Oronite Company LLC, Oak Point Plant

PI-724, Hazard Communication Standard

5.0 Records

All forms generated by this procedure shall be retained in the Compliance files in accordance with the Compliance Document Management Policy.

Obsolete copies of this procedure shall be archived in the OPDMS in accordance with Corporate retention guidelines. Requests for review copies of documents in Archive Status shall be made in accordance with PI-113.

Record of Revisions and Reviews

Page	Revision	Date	Comments
1-15(2)	1.00	10/25/1993	Creation of the document, procedure, etc.
1-15(2)	1.01	12/1993	Minor revisions
1-15(2)	1.02	05/1994	Minor revisions
1-15(2)	1.03	06/1994	Minor revisions
1-16(3)	1.04	07/1995	Minor revisions
1-16(3)	1.05	12/1995	Added misc. references to OPA 90 and USCG and 15 minutes to 1 hour reporting time in section 4.3
1-16(3)	1.06	07/1996	Minor revisions to Attachment "B"
1-25(3)	1.07	03/1997	Revision includes re-numbering of pages; addition of Attachments "A"-"C" to document
1-26(3)	1.08	10/1997	Added SO2/SO3 release reporting procedures
1-16($)	1.09	01/1999	Incorporate new LA State Police reporting procedures, plus minor revisions to entire document
1-9(3)	1.10	07/30/2004	Review of ERM document, update of signatures and application of new format.

(#) = Number of attachment pages

6.0 Attachments

Attachment 1 – Uniform Hazardous Material Reporting Form
Attachment 2 - Helpline/Environmental Concern Form
Attachment 3 - Release Emissions Calculations

Chevron ORONITE Oak Point Plant	Oak Point Emergency Response Manual Release Procedures	ERM-6.10 Rev: 1.10 Application Date: 05/20/03 QAR Document Code: N/A ATTACHMENTS Page 1 of 3

Revisions are shown by **R** and { Text. }

Attachment 1

Uniform Hazardous Materials Reporting Form

	Date	Time
Time Incident Occurred		
Time Incident Secured		

Courtesy Call ☐ Reportable ☐

Caller's Name: _____

	Incident #	Date Notified	Time
LA State Police **225-925-6595**			
Plaquemines Parish **682-1446**			
NRC (Notified if Needed) **1-800-424-8802**			

Incident Location:	10285 Hwy 23 South	**Parish:**	Plaquemines
Company:	Chevron Oronite Co. LLC	**Address:**	P. O. Box 70, B. C. LA 70037

Chemical Released:		**Qty.**	**RQ.**
If Quantity Undetermined, Check One:			
☐	**Unusual Event**	Does not present a current threat to persons or property	
☐	**Site Emergency**	Effects only near-site population, emergency secured or in recovery mode, may need road closure or shelter-in-place	
☐	**General Emergency**	Goes beyond facility boundary and effects or will effect general population, must close road or shelter-in-place immediately	

EHS ☐	Solid ☐	Liquid ☐	Gas ☐

Did material go offsite? Yes ☐ No ☐ Released to: Land ☐ Water ☐ Air ☐

Any off-site protective action? Yes ☐ No ☐

Road Closure ☐ Shelter-in-place ☐ Evacuation ☐

Wind Direction:	_____	Fire:	Yes ☐	No ☐			
Wind Speed:	_____	Injuries:	Yes ☐	No ☐	#	_____	
Temperature:	_____	Fatalities:	Yes ☐	No ☐	#	_____	
Precipitation:	None ☐	Rain ☐	Hail ☐	Sleet ☐	Snow ☐		

Additional Details

Attachment 2

Helpline/Environmental Concern Form

Date _____ Time _____ a.m. / p.m. Helpline/External Call _____

OP/Internal Concern _____

Chevron Rep Taking Call _____ Caller's Name _____

Caller's Address / Work Area _____

Nature of Concern _____

_____

_____

Offsite Impact? Yes ☐ No ☐

Did you have to leave the plant to resolve? Yes ☐ No ☐

Comments

Assigned Investigators: _____ _____

_____ _____ _____

Investigation Results

Person Responsible for Fix: _____ Area: _____

Fix Implemented
(Specify information given, agreed upon follow-up date and information for follow-up, etc.)

Date of Follow-up Call: _____ Time: _____ a.m. / p.m.

Signature: _____

Attachment 3

RELEASE EMISSIONS CALCULATIONS

SO_2 EMISSIONS CALULATIONS

Assume the concentration is 20X} the average C-5290 SO_2 concentration in the hour preceding the shutdown and use C-5290's stack gas flow rate (assume saturated at 170°F) along with the duration of the shutdown.

____ ppmv SO_2 in C-5290 x 20 x _____ ft^3/min x 0.00000008452 lb/ft^3ppmv x ___ mins = _____ lbs SO_2

H_2S EMISSIONS CALCULATIONS

STEP 1: If the H2S release is not from C-5290, go to Step 2.
Using the average C-5290 SO_2 concentration in the hour preceding the shutdown and C-5290's stack gas flow rate (assume saturated at 170□F) along with the shutdown's duration.

_____ ppmv SO_2 x _____ ft^3/min x 0.00000004490 lbs/ft^3ppmv x ___ mins = _____ lbs H_2S

STEP 2:
Assume the concentration in F-5251 is 20X} the average C-5290 SO_2 concentration in the hour preceding the shutdown and use C-5290's stack gas flow rate. (Assume saturated at 170°F)

_____ ppmv SO_2 x 20 x _____ ft^3/min x 0.00000004490 lbs/ft^3ppmv x ___ mins = _____ lbs H_2S

Revisions are shown by R and { Text. }

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APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
HUMAN RESOURCES MANAGER	HEALTH & SAFETY SUPERVISOR	AMERICAS REGION MANAGER
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OPDMS

All networked personal computers shall have access to the most current version of this Plant Instruction in accordance with PI-111, "Control of Quality Assurance Related Documents and Procedures."

1.0 Introduction/Scope

The purpose of this document is to establish procedures that shall be implemented when a bomb threat is received and/or when a bomb or suspected bomb has been found. Employee safety should be the primary concern of all actions taken.

Human Resources will be responsible for maintaining current and updated information for this document.

The procedures in this document apply to all personnel at the Oak Point Plant.

These procedures apply specifically to the Receptionist and the Gate No. 3 Security Officers because they most likely will be the ones to receive a bomb threat via telephone. These procedures apply to all personnel in general because a bomb threat can be received on any telephone line.

Bomb threats can also be delivered. Mail Room personnel should be alert to suspicious letters and packages arriving in the mail, and they should know how to respond appropriately.

2.0 Bomb Incident Plans

2.1 Bomb Threats

Bomb Threat via Telephone

The Receptionist in the Administration Building will most likely be the one to receive the bomb threat during the business hours of 7:30 a.m. to 4:00 p.m.

Outside of normal business hours, Security personnel at Gate No. 3 will normally receive the bomb threat. Security personnel should contact the Manager-on-Call or designee as soon as possible.

But again, as was stated in the introduction, a bomb threat could actually come in on any telephone line.

Either the Receptionist or the Security Officer at Gate No. 3 will activate an automatic recording device if they receive the bomb threat. Anyone in the Plant who receives a bomb-threat call, should use the OP-2038, "Bomb Threat Checklist" (Attachment 1 to this document) to record details of the phone call.

The person receiving the incoming telephone call should do the following:

- Use OP-2038, "Bomb Threat Checklist", (Attachment 1) to record details of the phone call.
- Record the information from the telephone display caller ID on your telephone.
- Remain calm and try to get as much information as possible. Remember that the caller is probably the best source of information about the bomb.
- Keep the caller on the line as long as possible. Ask the caller to repeat the message as many times as possible. As much as possible, record every word spoken by the person making he call. Ask the caller to repeat the message so that you can make sure you get it right.
- Get the bomb location and time of detonation.

- Tell the caller that the bomb could kill or maim many innocent people. The caller may wish to avoid hurting people.

- Note any strange or peculiar background noises such as background music (including type), running motors, street noise, construction and any other noises that could give a clue about where the call is being made.

- Listen closely to the caller's voice.

- **Let the caller hang up first. DO NOT** hang up on the caller.

- After the caller hangs up:

  - First, quickly record any additional information or impressions that come to mind about the call.
  - Second, immediately notify the Receptionist or Security who will call the Plaquemines Parish Sheriff's office (911) and a manager. If the phone number of the caller was not captured, then they will also call the telephone company to trace the call.

Written Bomb Threats

Once a mailed item has been recognized as a bomb threat or a possible bomb, leave it alone. Avoid handling it any more. Notify Oak Point Management as outlined below.

If it turns out to be a bomb, evacuate the immediate area and wait for further instructions.

If a written bomb threat arrives via mail or other means, save all materials: paper, envelope, packaging, container, etc. and avoid all unnecessary handling. Fingerprints, handwriting, typewriting, paper, and postal marks could become vital clues leading to the sender.

2.2 Notify Oak Point Management

Whatever the circumstances happen to be, make sure that Oak Point Management knows about all bomb threats as soon as possible. During normal business hours (7:00 a.m. to 4:30 p.m.), notify one of the following managers (in preferential order):

1. Americas Region Manager
2. Human Resources Manager
3. Operations Manager
4. Technical Manager
5. Maintenance Manager
6. Section Supervisor
7. Any available Supervisor

One of the above managers will generally become the Person-in-Charge as described in Section 2.3 (below). Remind the notified manager that all communication devices such as cell phones, pagers and radios should be turned off and removed from the suspected area.

DANGER: Radios, cell phones and pager transmissions can detonate certain bombs. Do not use these devices when a bomb threat has been received.

2.3 Person-In-Charge

Chain of Command

The available Manager, Manager-On-Call, or a designee -- hereafter referred to as the Person-in-Charge -- will call a meeting in the Command Center to discuss the situation. The Small Conference Room in the Administration Building will normally serve as the Command Center. The Person-in-Charge will coordinate and be responsible for all bomb threat activities.

The people meeting in the Command Center face three basic alternatives:

- Ignore the threat.
- Evacuate immediately.
- Search and evacuate if warranted.

Oak Point will normally choose the third alternative, "Search and evacuate if warranted."

The people meeting at the Command Center must then decide whether or not to call in outside help.

Security Officers

The Person-in-Charge will instruct the Security Supervisor to (a) secure all gates and (b) NOT allow anyone to enter or exit without permission from the Person-in-Charge. Exceptions:

- Local Sheriff's Department
- Chevron Corporate Security
- Bomb disposal team

The Person-in-Charge will notify Chevron Corporate Security (925-842-6432), giving them all information concerning the threat.

Sheriff

Always give the authorities the company name and Plant location. If the situation dictates, the law officers will request that a bomb-disposal team be sent.

Initiate Search

The Person-in-Charge will direct Chevron Oronite Supervisors or other designated employees to check all areas for unfamiliar objects such as attaché cases, women's handbags, suitcases, boxes, wrapped packages, etc. Closets, washrooms, storage rooms, lunch pails and particularly waste paper containers should be searched. If any unfamiliar item is located, report its exact location to the Person-in-Charge. **UNDER NO CIRCUMSTANCES SHOULD IT BE TOUCHED OR MOVED. LIMIT SEARCH TO VISUAL OBSERVATION TO AVOID SETTING OFF A BOMB.**

Listed below are the areas to be checked, and by whom:

Administration & Technical Buildings

- Normal business hours: Technical and Operations Managers
- After hours: same as for OPLC (below)

OPLC

- Normal business hours: Human Resources Manager
- After hours: Security Supervisor or Gate 3 Security Officer and Chevron Oronite BSU&E Shift Supervisor on duty

Maintenance Shop and Offices, Stores, Scrap Yard, Heavy Equipment Yard, T&M Contractors Offices

- Normal business hours: Maintenance Manager
- After hours: either (a) the Gate No. 3 Security Supervisor, or (b) the Security Officer and the Maintenance Supervisor

Laboratory

- Quality Control Lab Shift Supervisor

Operations Control Rooms

- Shift Supervisor of the appropriate area

All Plant Gates, Perimeter, Landfills, and Wharf

- Security Supervisor, along with the Security Officer, who will contact the Security Administrative Supervisor

If a bomb or a suspected bomb is found in the plant, the bomb disposal team will take charge. If the bomb is to be removed, the area will be evacuated in order to allow the removal of the bomb. The supervisor responsible for the area will determine the route to be used while evacuating employees.

Protection of Personnel

If a suspicious object is located, the Person-in-Charge will do the following:

- Appoint someone to control and protect personnel (i.e., to prevent panic and crowds from gathering).
- Put all equipment in a safe condition and evacuate all personnel who might be in danger, if this seems appropriate or when in doubt.
- Keep a standby crew near the Plant property if the danger area is not certain.
- Send the rest of the personnel to a safe area.
- Direct personnel to leave all windows and doors open and proceed to the designated area.

When a suspicious object has been located, Plant Security personnel will do the following:

- Report the location of the suspicious object, along with an accurate description, to the Person-in-Charge.
- Prevent anyone from moving, jarring, or touching a suspicious object or anything attached to it. Only the bomb disposal team will be allowed to remove or dispose of the bomb.

- Keep unauthorized people at least 300 feet away from the suspicious object – including the floors above and below – until the device has been removed/disarmed and the area declared safe for re-entry.

- Make sure that the doors and windows of the surrounding building or structure are open. This precaution will minimize primary damage from the blast and secondary damage from fragmentation.

- The appropriate Bomb Technicians for Plaquemines Parish may be reached 24 hours per day by calling the FBI at 504-816-3000. Be sure to tell them we are the Chevron facility in Plaquemines Parish south of Belle Chasse on Highway 23.

Re-Entry

After determination has been made that the facility is safe to re-enter, the Person-in-Charge will authorize an orderly re-entry.

Notify Home Office Management

The Americas Region Manager or designee will notify Oronite management in San Ramon.

2.4 Reporting

Human Resources will provide a written report of the incident and will forward it to San Ramon management through the Americas Region Manager.

3.0 Definitions

OPLC - Oak Point Learning Center

Command Center - Normally located in the Small Conference Room of the Administration Building.

4.0 References

PI-004, Plant Security, located in OPDMS

5.0 Records

Obsolete copies of this procedure shall be archived in the OPDMS in accordance with Corporate retention guidelines. Requests for review copies of documents in Archive Status shall be made in accordance with PI-113.

Record of Revisions and Reviews

Page	Revision	Date	Comments
	1.00	08/1992	Creation of the procedure
1-7(0)	1.01	03/1993	Revision of the procedure to PI-111 format
1-8(1)	1.02	09/1993	Revisions to procedure, Sections 2.0, 3.0, 4.0, 5.0 and Attachment 1
1-8(1)(6)	1.03	12/1993	Incorporation into the *Oak Point Emergency Response Manual*
1-11(2)	1.04	01/1999	Revision to Section 4.2 of Attachment "A"
1-7(1)	1.05	07/30/04	Review of procedure. Application of new format.

Revisions are shown by R and { Text. }

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Page	Revision	Date	Comments
1-7(1)	1.06	06/30/05	Review of procedure and complete rewrite of Section 2.1 Bomb Threats, Bomb Threat via Telephone and Section 2.3, Person-in Charge, Chain of Command and Sheriff

(#) = Number of attachment pages

NOTE: Complete rewrite of document. No revision indicators used.

6.0 Attachments

Attachment 1 - OP-2038, Bomb Threat Checklist

Attachment 1

BOMB THREAT CHECKLIST

Instructions: Be calm. Be courteous. Listen. Do not interrupt the caller. Notify supervisor/security officer by pre-arranged signal while caller is on line.

Bomb Facts

Pretend difficulty with hearing · Keep Caller talking · If Caller seems agreeable to further conversation, ask questions like:

When will it go off? Certain Hour _____ Time Remaining _____
Where is it located? Building _____ Area _____
What kind of bomb? _____ Where are you now? _____
How do you know so much about the bomb? _____
What is your name and address? _____
If building is occupied, inform caller that detonation could cause injury or death.

Did Caller appear familiar with plant or building by his description of the bomb location? Write out the message in its entirety and any other comments on a separate sheet of paper and attach to this checklist.

Caller's Identity

Sex: Male ____ Female ____ Adult ____ Juvenile ____ Approximate Age ____ Years

Origin of Call

Local _____ Long Distance _____ Booth _____ Internal (From within bldg?)

Voice Characteristics

- ☐ Loud
- ☐ High Pitch
- ☐ Raspy
- ☐ Intoxicated
- ☐ Soft
- ☐ Deep
- ☐ Pleasant
- ☐ ____ Other

Speech

- ☐ Fast
- ☐ Distinct
- ☐ Stutter
- ☐ Slurred
- ☐ Slow
- ☐ Distorted
- ☐ Nasal
- ☐ Lisp
- ☐ _____ Other

Language

- ☐ Excellent
- ☐ Fair
- ☐ Foul
- ☐ Good
- ☐ Poor
- ☐ _____ Other

Accent

- ☐ Local
- ☐ Foreign
- ☐ Not Local Region

Manner

- ☐ Calm
- ☐ Rational
- ☐ Coherent
- ☐ Deliberate
- ☐ Righteous
- ☐ Angry
- ☐ Irrational
- ☐ Incoherent
- ☐ Emotional
- ☐ Laughing

Background Noises

- ☐ Factory Machines
- ☐ Bedlam
- ☐ Music
- ☐ Office Machines
- ☐ Party Atmosphere
- ☐ Trains
- ☐ Animals
- ☐ Quiet
- ☐ Airplanes
- ☐ Street Traffic
- ☐ Mixed

Action to Take Immediately After Call

Record additional information or impressions. Notify your supervisor, the receptionist and/or security as instructed. Talk to no one unless instructed to do so by your supervisor.

Name _____ Time _____ Date _____

NOTIFY CORPORATE SECURITY

Revisions are shown by R and { Text. }

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APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
HEALTH AND SAFETY DEPARTMENT	SAFETY SUPERVISOR	AMERICAS REGIONAL MANAGER
S. J. STUNTZ	G. A. CREEKMORE	M. H. BURNSIDE

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OUTLINE

		Page No.
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2.0	Procedure	3
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2.2	Phase II: Storm in the Gulf or >Category 2 Storm Predicted to Affect N.O.	6
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1.0 Introduction/Scope

This document covers our preparations and procedures for dealing with tropical storms and hurricanes.

In Phase I, we do pre-season preparations and begin to monitor tropical storm activity that could affect the Oak Point Plant. Then as a tropical storm or hurricane begins to pose a greater threat to the Oak Point Plant, we upgrade our state of readiness through four more stages. The final phase is Recovery where we return the plant to normal operations.

Storm Phases

Phase I	Pre-Season Preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weathering" the storm or Evacuation
Phase VI	Recovery

Weather Consultant

Storm updates from Universal Weather and Aviation, Inc.

Phone:	(877) 792-3220 or (713) 944-1440 ext. 2231 or 1-800-231-8648 ext. 2231
Fax:	(713) 943-4647
www:	http://www.ImpactWeather.com
Email:	impact@univ-wea.com

2.0 Procedure

General Information

HURRICANE CATEGORIES	ONE 74-95 mph	TWO 96-110 mph	THREE 110-130 mph	FOUR 131-155 mph	FIVE 155+ mph
STORM STATUS	**STORM PHASE**				
Hurricane in the Gulf or > Cat. 2 Storm Predicted to Affect New Orleans	II	II	II	II	II
Gale Force Winds Predicted 39-74 MPH within 36 Hours	III	III	III	III	III
75+ MPH Winds within 36 Hours	III	III	III	IV	IV

75+ MPH Winds within 24 Hours	IV	IV	IV	V	V
Flood Water in the Plant (> +2.5 ft MSL water in basin)	V	V	V	V	V

- The two 1750-cfm diesel-powered air compressors are to serve as backups for the electrically powered air compressors at Oak Point. The one, 750-cfm diesel-powered air compressor with a dryer is for use on the API N_2 back-up loop.
- A general plant objective is to keep all utilities, including the Incinerator running during the storm except for complete plant evacuation.
- When the National Hurricane Center in Miami places the section of the Gulf Coast that lies between west longitudes 88° 30' and 92° 00' under a **Tropical Storm Watch**, it means that tropical-storm conditions can affect the Oak Point Plant within 36 hours. Tropical-storm conditions include rising waters and winds ranging from 39 to 73 mph.
- If the area is placed under a **Hurricane Watch**, it means that hurricane conditions can affect the Oak Point Plant within 36 hours. Hurricane conditions include winds of 74 mph or higher and can include floodwaters of 10-20 feet according to the Louisiana Office of Emergency Preparedness.
- When the National Hurricane Center in Miami places the section of the Gulf Coast that lies between west longitudes 88° 30' and 92° 00' under a **Tropical Storm Warning or a Hurricane Warning**, it means that topical storm or hurricane conditions threaten the Oak Point Plant within 24 hours.
- As much as possible, protect the Stormwater Treatment System from contamination by the Chemical Waste System to prevent discharge violations or operating problems.
- Due to the bug colonies in the bio disc and the PACT Unit, it is preferable to keep both units running. Shut down if necessary, but first:
  - Shut down the major process units.
  - Flush the chemical sumps with either fire-fighting water or rainwater; put the extra water into T- 7611 or inject it down the well.
- For guidance when working in flood conditions, refer to ERM 6.14, "Handling Plant Flood Emergency".

2.1 Phase I Pre-Season Preparations (May 1-31)

2.1.1 Storm Defense Coordinator

- Conduct awareness and preparedness meeting with plant representatives. Review the storm threat procedure at the meeting.
- Request volunteers who want to be considered for skeleton-crew assignment for the current hurricane season.
- Locate the satellite phone and verify it works.

- Evaluate the costs/expected benefits of placing a large capacity pump on standby for the hurricane season. If justified, execute arrangement using alliance provider.
- For the large capacity water pump, locate and inspect:
  1. fire hoses (3 runs at about 800 feet each)
  2. fittings for the hoses
  3. manifold that fits on the discharge of the large capacity water pump
  4. discharge manifold for the end of the hose runs at the edge of the river

  Make any necessary repairs or replace any items as needed.
- Review critical motor list (consult with Maintenance); update as needed; refer to **Attachment D-2.**
- Ensure the following items are completed:
  1. 1000 sandbags are on hand.
  2. Non-perishable items are on hand and suitable for the current hurricane season; refer to **Attachment E-2.**
  3. Supply of oil booms and absorbent pads are available (for plant drains).
- Begin tracking storm activity as soon as the plant's weather service begins providing reports.

2.1.2 Maintenance

- If directed by the Storm Defense Coordinator (SDC), place large capacity pump on stand-by (likely for the entire hurricane season).
- For the large capacity water pump, locate and inspect:
  1. fire hoses (3 runs at about 800 feet each)
  2. fittings for the hoses
  3. manifold that fits on the discharge of the large capacity water pump
  4. discharge manifold for the end of the hose runs at the edge of the river

  Make any necessary repairs or replace any items as needed.
- Review critical motor list; update as needed; refer to **Attachment D-2.**
- For critical motors:
  1. Check on-site inventory
  2. As needed, purchase or locate suppliers.
- Supply 1000 sand bags, oil booms, and absorbent pads.
- Do inspection and repairs (as needed) to storm trailer.

2.1.3 Human Resources

- Review all non-perishable items; refer to **Attachment E-2**. Replace as needed.
- Give Storm Defense Coordinator key access to the storm trailer.

2.1.4 Technical

- Collect existing or make hard copies of:
  1. Electrical one-line drawings
  2. CTN phone list

  Place them in the drawing file room (second floor Technical Center).
- For the satellite phone :
  1. Locate it
  2. Verify it works

2.2 Phase II Storm in the Gulf or >Category 2 Storm Predicted to Affect N.O.

2.2.1 Americas Regional Manager

When the Americas Regional Manager or his/her authorized delegate determines that a tropical storm or hurricane poses a threat to the Oak Point Plant, he/she will upgrade the state of readiness of the Oak Point Plant following the phases in this procedure. The first step is the decision to implement Phase II; it is usually based on projections that a tropical storm or hurricane in the Gulf of Mexico poses a threat to the plant or a >Category 2 storm is predicted to enter the Gulf and affect the New Orleans area.

During Phase II, the Oak Point Plant will continue normal operations and take the appropriate precautions listed under this phase of readiness.

- Place the plant in Phase II.

2.2.2 Storm Defense Coordinator (SDC)

- Conduct a current storm preparation meeting with plant representatives.
- Begin shutdown of construction work and cleanup of construction work areas.
- Identify all empty tanks that will need to be ballasted. (A ballasted tank should contain stock 3-5 feet deep or water up to the open man-ways.)
- Develop the skeleton-crew list of people to work during this storm. Refer to **Attachment B-2** for skeleton-crew staff list.
- Direct skeleton-crew members to begin personal and family preparations to allow skeleton-crew members to stay at the plant during the storm.
- Begin use of Newsline (ext. 6611) to keep plant workers informed of storm status. Refer to **Attachment B-7** for Hurricane news-line instructions.
- Ensure that Maintenance has set up the large capacity by-pass pump and that it is ready to run.
- Develop plans and priorities for shutdown of all process units plus the wharf.
- Develop plans to shutdown utilities in priority order. (However, the intent is to operate all utilities as long as it is safe. The most important utilities are co-gen, steam, firewater, and all water treatment systems.)

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- Arrange for securing natural gas supplies. Contact Enbridge and Gas Group contact in Houston. For 2005, this will be:

  Scott Wischoff – 832-854-5053
  Charlie Mertz – 832-854-5046 }

2.2.3 Operations

- Print out current tank gauge sheets:
  1. Verify that the information is accurate
  2. Give the information to the SDC.

- Assist SDC in developing the skeleton-crew list of people to work this storm.
- Assist SDC in developing plans and priorities for shutdown of all process units plus the wharf.
- Inspect all operating areas; pick up loose items or secure them.
- Pre-ship product where practical.
- Review water treatment chemical inventories; consider increasing to maximum inventory levels.
- Begin ballasting tanks where it does not prevent normal operations.
- Begin securing equipment throughout the plant.

2.2.4 Maintenance

- Assist Operations as requested for storm preparations, including securing equipment throughout the plant.
- Assist SDC as requested for storm preparations.
- Set up the large capacity water pump at the forebay.

2.2.5 Human Resources

- Develop a plan to reestablish a full complement of security officers after the storm and provide it to the SDC.

2.2.6 Technical

- Begin making full (100%) backup files every night for all computer systems.

2.3 Phase III Securing Plant and Shutdown of Process Units

2.3.1 Americas Regional Manager

Based on advisories by the National Hurricane Center and our weather consultant, the Americas Regional Manager or his/her authorized delegate will decide when to place the Oak Point Plant in Phase III. During Phase III plant personnel will make final preparations for the arrival of the storm. A full complement of workers is available at the plant during this phase.

- Place the plant in Phase III.

2.3.2 Storm Defense Coordinator

During this phase, the Oak Point Plant still has a full complement of workers.

- Shutdown all process units and the wharf per the plan prepared in Phase II.
- Remind plant employees of the Newsline (ext. 6611 or 391-6611) to call for information about the plant's storm threat status and work reporting instructions.

- Complete shutdown of all construction work:
  1. secure all construction equipment and supplies in the plant areas
  2. secure the contractor laydown areas
- Decide when non-essential office staff will be allowed to go home or directed not to report to work. Use the Newsline as one means to inform employees.
- Secure materials and equipment throughout the plant.
- Decide when to allow workers with special circumstances to leave work:
  1. workers who live in neighborhoods with a voluntary evacuation
  2. workers who live in neighborhoods with a mandatory evacuation
  3. workers with other special circumstances

2.3.3 Operations

- Complete ballasting all empty tanks, when directed by the SDC.
- Consider taking pictures during storm preparations to document such things as equipment hook ups or unusual events.
- Shutdown process units when directed by the SDC following plan prepared in Phase II.
- Keep a record of any unusual actions done to shutdown the process units. (This information will simplify start-up operations after the storm has passed.)
- Clear space in the Drumming Facility and/or the Maintenance Shop to park vehicles for the skeleton-crew.
- Ensure ERV's fuel tanks are full.
- Ensure we have full diesel and gasoline storage tanks.
- Tie down gangways at the wharf facilities with straps or chains. Lock loading arms in the raised position by inserting the pins.

2.3.4 Maintenance

- For all items in **Attachment D-3**:
  1. obtain them
  2. store at the plant
  3. provide a list to the SDC showing where the items are stored
- Assist Operations as requested for storm preparations.
- Assist SDC as requested for storm preparations.
- Set up and connect emergency generators.
- With assistance from Technical, hook up generator for computer and telephone room.
- Ensure on-site fuel tanks are full:
  1. diesel
  2. gasoline

- String the hoses and install two discharge manifolds for the large capacity water pump.
- As needed or desired, place oil recovery booms around plant drains. Tie in place.

2.3.5 Human Resources

- Remove non-perishable items from storage and put them in the Technical Center Conference Room; refer to **Attachment E-2.**
- Move a medical trauma kit from the Oak Point Employee Health Center to the Technical Center Conference Room.
- Purchase the perishable items and bring them to the plant. Ensure the supplies are kept secure and store them correctly to prevent spoilage. Refer to **Attachment E-3.**

2.3.6 Technical

- Ensure we have current and complete backup files for:
  1. Fischer Porter
  2. TI Star
  3. Honeywell
  4. all servers
  5. all VAX computers
- Identify I&E and computer personnel who will be available to assist early in Phase VI. Inform the SDC.
- Send full backup files to off-site storage daily.
- Secure all construction sites in the plant.
- Secure all contractors laydown areas.
- Assist Maintenance in hooking up generator for computer and telephone room.

2.4 Phase IV Final Storm Preparations

2.4.1 Americas Regional Manager

- Place the plant in Phase IV.
- Provide assistance as needed to SDC's family for storm preparations or evacuation.
- Turn over responsibility for the plant to the SDC.

2.4.2 Storm Defense Coordinator

- Select reporting time for skeleton-crew; notify all members.
- Notify oncoming crews not to come in.
- Send all other on-site personnel home except for skeleton-crew members.

- Do periodic updates as needed to Newsline 6611 to keep on-site and off-site workers informed.
- Park vehicles for skeleton-crew members either inside the Drumming Facility or inside the Maintenance Shop.
- Set up procedures for managing the emergency supplies, especially the food.
- As needed, stretch guide and safety-line ropes at the following locations:
  1. From the Technical Center to the Chemical Warehouse
  2. From the Technical Center to the Lab
  3. From the Lab to the Central Control Room
  4. From the Main Office to the Drumming Facility
  5. But NOT over storm drains or manhole covers
- Account for all people remaining in the Plant.
- Decide when to begin use of large pumps to bypass the water treatment system following procedure entitled "Stormwater Treatment System By-Pass". This procedure can be found in the Ecology Area Environmental Handbook, Section III entitled "Treated Stormwater and Wastewater". Consult Environmental Team representative as needed/available to ensure this critical decision is made and implemented properly.
- Monitor plant areas; take corrective steps to protect plant property as long as it is safe.

2.4.3 Operations

- Shutdown B&S area.
- Stop railroad switch. Inform railroad representative to telephone the BS&U Shift Supervisor each morning to determine if a switch will be scheduled.
- Cancel inbound and outbound shipments of all trucks.

2.4.4 Technical

- Perform orderly shut down of all computer equipment including Fisher Porter, Honeywell, and TI Star after the equipment or its use is shutdown.
- Upon leaving the plant, send or take latest copy of all backup files to off-site storage.

2.5 Phase V "Weathering" the Storm or Evacuation

2.5.1 Americas Regional Manager

No duties are required in Phase V.

2.5.2 Storm Defense Coordinator

Before placing the Oak Point Plant in Phase V the SDC will consider:

a. The storm's speed, strength, angle of attack, etc. and
b. Whatever else he or she considers to be important.

- Secure control rooms, buildings, and plant gates.
- Monitor plant areas; take corrective steps to protect plant property as long as it is safe.
- Operate the Storm Water System and its flow to the river as long as possible to minimize flooding.
- Operate the PACT Unit and its flow to the river as long as possible.
- Shutdown or continue to operate utilities per Phase III plan and current conditions.
- Bring everybody into the Technical Center when the winds begin to exceed 50 mph.
- Move the skeleton-crew and emergency supplies to the second floor of the Technical Center if it becomes threatened by floodwaters.
- Leave any electrical breakers on that are not threatened to prevent moisture from backing into the cables and corroding them

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ABANDONING THE PLANT: For all Category 4 or 5 storms for which the plant is under a hurricane warning, the skeleton crew shall completely shutdown choose to evacuate the plant or decide to ride out the storm inside the facility. For Category 3 storms, the SDC will determine if the skeleton-crew stays or evacuates the plant, considering any guidance provided by the Americas Regional Manager in the earlier phases of preparation for this storm. If it is decided to abandon the plant, as soon as all utilities are shutdown and secured, all remaining personnel, including Security personnel, shall be evacuated. All gates shall be closed and locked. }

2.6 Phase VI Recovery

2.6.1 Americas Regional Manager

- Resume responsibility for the plant from the Recovery IC when it is safe to return to work.
- Decide on special leave and leave rules for employees who may participate in Civil Defense or other community recovery activities.
- Evaluate assistance to the community:
  1. Assess situation through LEPC contact or Plaquemines Parish Government representatives.
  2. Determine where facility resources fit with community needs and provide assistance as appropriate.

2.6.2 Storm Defense Coordinator/Recovery IC

The SDC shall decide when to begin the recovery phase. He or she should:

- Select a person to serve as Recovery Incident Commander to relieve the SDC

and to direct the recovery phase until relieved by plant management.

- Start up critical utilities first:
  1. Co-gen/electrical systems
  2. instrument air
  3. nitrogen
  4. carbon dioxide

- Consider use of environmental contractor to clean up floating oil throughout the plant.

- Request I&E and computer personnel from Technical to help with computer system startups or troubleshooting.

- Plan to resume normal operations and bring all personnel back to their regular jobs as soon as possible.

- Evaluate assistance to the community:

  1. Assess situation through LEPC contact or Plaquemines Parish Government representatives.
  2. Determine where facility resources fit with community needs and provide assistance as appropriate.

2.6.3 Operations

- Assess all operating areas; direct clean up and isolation as needed to ensure safe access.

- Develop priorities for drying out and restarting the plant.

2.6.4 Maintenance

- Assist Operations and the Recovery IC in recovery activities.

2.6.5 Human Resources

- Recover and store non-perishable supplies. Refer to **Attachment E-2.**

- Promptly repair or replace non-perishable supplies that are damaged or missing so they will be available for the next tropical storm.

2.6.6 Technical

- Send I&E and computer personnel to the plant as soon as authorized by the Recovery IC.

2.7 Procedure Review and Updates

- During March the SDC shall hold a meeting of plant representatives to do a review of storm threat experience for the hurricane season. Any desired changes to the storm threat procedure shall be discussed.

- The Safety Supervisor shall be responsible to update the Storm Threat Procedure based on comments from the March meeting. The revision shall be complete by the end of April.

3.0 Definitions

ERM = Oak Point Emergency Response Manual

HAZWOPER = Hazardous Waste Operations and Emergency Response (OSHA regulation 1910.120)

LAN = Local area network

SDC = Storm Defense Coordinator

4.0 References

None

5.0 Records

Obsolete copies of this procedure shall be archived in the OPDMS in accordance with Corporate Retention Guidelines. Requests for review copies of documents in Archive Status shall be made in accordance with PI-113.

Record of Revisions and Reviews

Page	Revision	Date	Comments
1-18(2)	1.00	July 1993	Creation of the procedure
1-18(2)	1.01	December 1993	Miscellaneous revisions
1-18(2)	1.02	May 1994	Miscellaneous revisions
1-19(2)	1.03	December 1995	Miscellaneous changes to Section 4.4.2.5, Attachment A and addition of Newsline telephone number
1-20(6)	1.04	January 1999	Addition of Sections 4.1.2.4, 4.1.2.4 and 4.3.2.7, 4.3.2.8, Attachment "C", "D" and general updates through document
1-20(6)	2.00	August 2000	Complete rewrite of the storm threat procedure
1-14(8)	3.00	July 2001	Complete rewrite of storm threat procedure.
1-13(24)	3.01	May 2002	Miscellaneous revisions
1-13(24)	3.02	June 5, 2002	Added to sections 2.1.2 & 2.1.3. Updated Attachment B-4.
1-13(25)	3.03	April 30, 2003	Review and update of appropriate phone numbers; revisions to Task Lists; other minor revisions.
1-14(25)	3.04	May 20, 2004	Review and update phone numbers; remove Plant Manager reference, add Americas Regional Manager; other minor revisions.
1-14(25)	3.05	June 20, 2005	Review and update to include contacts for natural gas supplies, update names and phone numbers in Attachment B-5, update waste water sampling per Attachment B-6, and update of perishable supplies listed in Attachment E-2.

(#) = Number of attachment pages

EP 1540 VAX Protection and Data Backup Procedures
EP 1550 Computer Room Shutdown and Start-up Procedures

6.0 Attachments

Attachment A	*Americas Regional Manager Task List*
Attachment B-1	*SDC Task List*
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Attachment B-3	*Hurricane Skeleton Crew Selection*
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Attachment D-3	*Storm Threat Equipment List*
Attachment E-1	*Human Resources Task List*
Attachment E-2	*Non-perishable Supplies*
Attachment E-3	*Perishable Supplies*
Attachment F	*Technical Task List*

Attachment A
Americas Regional Manager Task List

The Americas Regional Manager or his/her authorized delegate will consult with the Storm Defense Coordinator on storm threat preparations.

Storm Phases

Phase I	Pre-Season preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weathering" the storm or Evacuation
Phase VI	Recovery

Weather Consultant

Storm updates from Universal Weather and Aviation, Inc.

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Fax:	(713) 943-4647
www:	http://www.ImpactWeather.com
Email:	impact@univ-wea.com

Phase II Storm in the Gulf or >Category 2 Storm Predicted to Affect N.O.

When the Americas Regional Manager or his/her authorized delegate determines that a tropical storm or hurricane poses a threat to the Oak Point Plant, he/she will upgrade the state of readiness of the Oak Point Plant following the phases in this procedure. The first step is the decision to implement Phase II; it is usually based on projections that a tropical storm or hurricane in the Gulf of Mexico poses a threat to the plant or a >Category 2 storm is predicted to enter the Gulf and affect the New Orleans area.

During Phase II, the Oak Point Plant will continue normal operations and take the appropriate precautions listed under this phase of readiness.

- Place the plant in Phase II.

Phase III Securing Plant and Shutdown of Process Units

Based on advisories by the National Hurricane Center and our weather consultant, the Americas Regional Manager or his/her authorized delegate will decide when to place the Oak Point Plant in Phase III. During Phase III plant personnel will make final preparations for the arrival of the storm. A full complement of workers is available at the plant during this phase.

- Place the plant in Phase III.

Phase IV Final Storm Preparations

- Place the plant in Phase IV.
- Provide assistance as needed to SDC's family for storm preparations or evacuation.
- Turn over responsibility for the plant to the SDC.

Attachment A (Continued)
Americas Regional Manager Task List

Phase V "Weathering" the Storm or Evacuation

No duties are required in Phase V.

Phase VI Recovery

- Resume responsibility for the plant from the Recovery IC when it is safe to return to work.
- Decide on special leave and leave rules for employees who may participate in Civil Defense or other community recovery activities.
- Evaluate assistance to the community:

  1. Assess situation through LEPC contact or Plaquemines Parish Government representatives.
  2. Determine where facility resources fit with community needs and provide assistance as appropriate.

Attachment B-1
SDC Task List

Storm Phases

Phase I	Pre-Season Preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weathering" the storm or Evacuation
Phase VI	Recovery

Weather Consultant

Storm updates from Universal Weather and Aviation, Inc.

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Fax:	(713) 943-4647
www:	http://www.ImpactWeather.com
Email:	impact@univ-wea.com

Phase I Pre-Season Preparations (May 1-31)

- Conduct awareness and preparedness meeting with plant representatives. Review the storm threat procedure at the meeting.
- Request volunteers who want to be considered for skeleton-crew assignment for the current hurricane season.
- Locate the satellite phone and verify it works.
- Evaluate the costs/expected benefits of placing a large capacity pump on standby for the hurricane season. If justified, execute arrangement using alliance provider.
- For the large capacity water pump, locate and inspect:
  1. fire hoses (3 runs at about 800 feet each)
  2. fittings for the hoses
  3. manifold that fits on the discharge of the large capacity water pump
  4. discharge manifold for the end of the hose runs at the edge of the river

  Make any necessary repairs or replace any items as needed.
- Review critical motor list (consult with Maintenance); update as needed. Refer to **Attachment D-2**.
- Ensure the following items are completed:
  1. 1000 sandbags are on hand.
  2. Non-perishable items are on hand and suitable for the current hurricane season-see **Attachment E-2**.
  3. Supply of oil booms and absorbent pads are available (for plant drains).
- Begin tracking storm activity as soon as the plant's weather service begins providing reports.

Attachment B-1
SDC Task List (Continued)

Phase II Storm in the Gulf of >Category 2 Storm Predicted to Affect N.O.

- Conduct a current storm preparation meeting with plant representatives.
- Begin shutdown of construction work and cleanup of construction work areas.
- Identify all empty tanks that will need to be ballasted. (A ballasted tank should contain stock 3-5 feet deep or water up to the open man-ways.)
- Develop the skeleton-crew list of people to work during this storm. Refer to **Attachment B-2** for skeleton-crew staffing requirements.
- Direct skeleton-crew members to begin personal and family preparations to allow skeleton-crew members to stay at the plant during the storm.
- Begin use of Newsline (ext. 6611) to keep plant workers informed of storm status. Refer to **Attachment B-7** for Hurricane Newsline instructions.
- Ensure that Maintenance has set up the large capacity by-pass pump and that it is ready to run.
- Develop plans and priorities for shutdown of all process units plus the wharf.
- Develop plans to shutdown utilities in priority order. (However, the intent is to operate all utilities as long as it is safe. The most important utilities are co-gen, steam, firewater, and all water treatment systems.)

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- Arrange for securing natural gas supplies. Contact Enbridge and Gas Group contact in Houston. For 2005, this will be:

  Scott Wischoff – 832-854-5053
  Charlie Mertz – 832-854-5046 }

Phase III Securing Plant and Shutdown of Process Units

During this phase, the Oak Point Plant still has a full complement of workers.

- Shutdown all process units and the wharf per the plan prepared in Phase II.
- Remind plant employees of the Newsline (ext. 6611 or 391-6611) to call for information about the plant's storm threat status and work reporting instructions.
- Complete shutdown of all construction work:
  1. secure all equipment and supplies in the plant areas
  2. secure the contractor laydown areas
- Decide when non-essential office staff will be allowed to go home or directed not to report to work. Use the Newsline as one means to inform employees.
- Secure materials and equipment throughout the plant.
- Decide when to allow workers with special circumstances to leave work:
  1. workers who live in neighborhoods with a voluntary evacuation
  2. workers who live in neighborhoods with a mandatory evacuation
  3. workers with other special circumstances

Attachment B-1
SDC Task List (Continued)

Phase IV Final Storm Preparations

- Select reporting time for skeleton-crew; notify all members.
- Notify oncoming crews not to come in.
- Send all other on-site personnel home except for skeleton-crew members.
- Do periodic updates as needed to Newsline 6611 to keep on-site and off-site workers informed.
- Park vehicles for skeleton-crew members either inside the Drumming Facility or inside the Maintenance Shop.
- Set up procedures for managing the emergency supplies, especially the food.
- As needed, stretch guide and safety-line ropes at the following locations:

  1. From the Technical Center to the Chemical Warehouse
  2. From the Technical Center to the Lab
  3. From the Lab to the Central Control Room
  4. From the Main Office to the Drumming Facility
  5. But NOT over storm drains or manhole covers

- Account for all people remaining in the Plant.
- Decide when to begin use of large pumps to bypass the water treatment system following procedure entitled "Stormwater Treatment By Pass". This procedure can be found in the Ecology Area Environmental Handbook, Section III entitled "Treated Stormwater and Wastewater". Consult Environmental Team representative as needed/available to ensure this critical decision is made and implemented properly.
- Monitor plant areas; take corrective steps to protect plant property as long as it is safe.

Phase V "Weathering" the Storm or Evacuation

Before placing the Oak Point Plant in Phase V the SDC will consider:

a. The storm's speed, strength, angle of attack, etc. and
b. Whatever else he or she considers to be important.

- Secure control rooms, buildings, and plant gates.
- Monitor plant areas; take corrective steps to protect plant property as long as it is safe.
- Operate the Storm Water System and its flow to the river as long as possible to minimize flooding.
- Operate the PACT Unit and its flow to the river as long as possible.
- Shutdown or continue to operate utilities per Phase III plan and current conditions.
- Bring everybody into the Technical Center when the winds begin to exceed 50 mph.
- Move the skeleton crew and emergency supplies to the second floor of the Technical Center if it becomes threatened by flood waters.

Attachment B-1
SDC Task List (Continued)

- Leave any electrical breakers on that are not threatened to prevent moisture from backing into the cables and corroding them

R {

ABANDONING THE PLANT: For all Category 4 or 5 storms for which the plant is under a hurricane warning, the skeleton crew shall completely shutdown and choose to evacuate the plant or decide to ride out the storm inside the facility. For Category 3 storms, the SDC will determine if the skeleton-crew stays or evacuates the plant, considering any guidance provided by the Americas Regional Manager in the earlier phases of preparation for this storm. If it is decided to abandon the plant, as soon as all utilities are shutdown and secured, all remaining personnel, including Security personnel, shall be evacuated. All gates shall be closed and locked. }

Phase VI Recovery

The SDC shall decide when to begin the recovery phase. He or she should:

- Select a person to serve as Recovery Incident Commander to relieve the SDC and to direct the recovery phase until relieved by plant management.
- Start up critical utilities first:
  1. Co-gen/electrical systems
  2. instrument air
  3. nitrogen
  4. carbon dioxide
- Consider use of environmental contractor to clean up floating oil throughout the plant.
- Request I&E and computer personnel from Technical to help with computer system startups or troubleshooting.
- Plan to resume normal operations and bring all personnel back to their regular jobs as soon as possible.
- Evaluate assistance to the community:
  1. Assess situation through LEPC contact or Plaquemines Parish Government representatives.
  2. Determine where facility resources fit with community needs and provide assistance as appropriate.

Attachment B-2
Skeleton Crew Staff List
(The number of Members may vary with need)

- One Storm Defense Coordinator
- One Shift Supervisor (preferably with U&E experience)
- Two Utility Operators (at least one Utility Head Operator preferred)
- One Maintenance Foreman (Optional)
- Two Ecology Operators
- Two Operators (preferably one from B&S and one from Manufacturing)
- Two Lab Inspectors for water-sample analysis
- Two Guards
- Two I&E Mechanics
- Two machinists or pipe fitters

Consideration will be given to Emergency Responders as part of Skeleton Crew staffing, listed above.

Attachment B-3

Hurricane Skeleton Crew Selection

- The Storm Defense Coordinator will request volunteers who want to be considered for skeleton crew assignment at the beginning of the hurricane season, normally in the month of May.
- In the event other employees wish to be considered for the skeleton crew at a later date, they must submit their request to the Operations Clerk.
- The Company will determine the number of employees and the qualifications required to staff the skeleton crew.
- Selection will be based on the most senior qualified employee.
- Employees will receive a rate of pay no more than two and one half times the adjusted 12 hour rate of pay, including the appropriates shift differential for the hours worked on the skeleton crew.
- Employees assigned to the skeleton crew and relieved of their regularly scheduled work day in preparation or post skeleton crew coverage will receive paid leave at the straight time rate

Attachment B-4
Local Emergency Contacts Phone Numbers

ORLEANS PARISH	**JEFFERSON PARISH**
Office of Emergency Preparedness Terry Tullier Director 1300 Perdido Street New Orleans, LA 70112 **504 565-7200**	Dr. Walter S. Maestri Emergency Management Director 1887 Ames Boulevard Marrero, LA 70072 **504 349-5360** **504 349-5366 (FAX)**
PLAQUEMINES PARISH	**CRESCENT CITY CONNECTION**
Jesse St. Amant Director 7163 Highway 39, Suite 202 Braithwaite, LA 70040 **504 682-1073 or** **504 682-0081 – 24 hr #** **(Woodlawn switchboard after hours)** **or 504 682-0081 – 24 hr #** **504 569-5337 (Beeper)** **504 450-0169 (Mobile)**	Allen Levasseur Executive Director 2001 Mardi Gras Blvd. New Orleans, LA 70114 **504 376-8131** **For Emergency Call:** **Police Dispatcher** **504 376-8180**
CAUSEWAY COMMISSION	**BELLE CHASSE VOLUNTEER FIRE DEPARTMENT**
P.O. Box 7656 Metairie, LA 70010 **For Emergency Call:** **Chief Felix Loycano** **Chief of Police** **504 835-3116**	104 New Orleans Street Belle Chasse LA 70037 **For Emergency Call:** **Woodlawn Operator at 911 or** **504 394-4070**

Attachment B-5
Names Given to Plaquemines Parish for Hurricane Passes

Title/Name	Pager	Home Phone	Cell Phone
Storm Coordinator Troy M. Tortorich	None	(504) 466-4894	(504) 296-4180
Americas Regional Manager Michael Burnside	None	(504) 897-4148	(504) 621-3262
Supply Chain Manager Mark Leopold	(888) 352-7996	(504)433-1903	(504) 905-3406
Technical Manager			
Operations Manager Bert Weller	None	(504) 362-5812	(504) 473-1718
Safety, Fire Health Supervisor Gerald Creekmore	(504) 794-1916	(504) 394-7950	None
Maintenance Manager Enrique Llewellyn	(504) 984-2345	(985) 727-7854	(985) 778-6952
Maintenance Section Supervisor Don Tague	(504) 794-1884	(504) 433-4231	None
Human Resources Manager Dave Bonnett	None	(504) 433-5523	(504) 912-4141
Purchasing Supervisor Charlie Matte	(504) 794-5727	(504) 394-3472	None
Section Supervisor, Manufacturing Mike A. Richard			
Operating Assistant Rusty Serpas	(504) 794-3000	(504) 682-4093	None
Operating Assistant Pepper Martin	None	(504) 391-9170	(504) 481-0447
Operating Assistant Lawrence Hill	(504) 544-9084	(504) 341-7346	None
Operating Assistant Marshall Mahoney	None	(504) 391-0654	None
Production Planning Supervisor Jim Pittman	None	(504) 888-5474	(504) 388-5476
Maintenance Foreman Glenn Coulon	None	(504) 656-0204	None
Reliability Team Leader			
Lead Engineer I&E Sakthivel Kandasamy		(504) 888-2955	(504) 231-7173
I&E Engineering Shawn Hidalgo	(504) 825-2167	(504) 726-0644	None
I&E Engineering Terri Dixon	(504) 794-0751	(504) 393-4880	None
I&E Engineering Mike Balliviero	(888) 592-1587	(504) 391-7228	(504) 237-7228
I&E Engineering Pat Fitzgerald	None	(985) 331-8990	(504) 442-7448
I&E Engineering Dan Trosclair	None	(985) 867-5600	None

Attachment B-6
Waste Water Samples Required by Permit

	T-7645	1x/week	PACE
R {	ST102	1x/week	TOC **(Do NOT sample while blinded)**
	ST102 PACE	1x/month	For Phenol **(Do NOT sample while blinded)** }
	ST202 Comp.	1x/week	TOC/BOD
	ST202 O&G	1x/week	Oil & Grease samples are caught only when going to river, grab.
	ST202 PACE	1x/month	ST202 PACE samples come from composite sample, for Phenol
	ST100	1x/week	TOC, Phenol, Utilities operator is responsible for bringing samples to Control Lab
	ST001	1x/week	TOC
R {	ST001	1x/month	Phenol }

Attachment B-7
Hurricane News-line Instructions

The Hurricane News-line can be accessed from any phone in the plant or even from outside the plant for messages updates by calling ext. 6442 or 391-6442. To place a message on the news-line from inside the plant, follow the instructions below:

- From any phone in the plant, **dial ext. 6442**. A recording will state "Prompt Maintenance, Voice Service ID".
- Enter the Voice Service ID "103" followed by the "#" symbol.
- You will now be prompted to enter the password for the respective service followed by the # symbol. Press "1036611" and then the "#" symbol.
- You are now in the Prompt Maintenance menu. You will need to press number "5" to begin recording your message. When you have completed the message, press the "#" symbol.
- You can replay your message by pressing number "2". If you are not satisfied with the message, you can begin recording again by pressing "5" to begin recording. You will need to press the "#" symbol when you stop recording your message.
- When you are satisfied with your message, hang up the phone.

You may also place a message on the news-line phone from outside the plant by dialing 391-6442 and following the above instructions.

The message will remain on the news-line until another message is taped on the news-line.

Attachment C
Operations Task List

Storm Phases

Phase I	Pre-Season preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weather" the storm or Evacuate
Phase VI	Recovery

Weather Consultant

- Storm updates from Universal Weather and Aviation, Inc.

Phone:	(877) 792-3220 or (713) 944-1440 ext. 2231 or 1-800-231-8648 ext. 2231
Fax:	(713) 943-4647
www:	http://www.ImpactWeather.com
Email:	impact@univ-wea.com

Phase II Storm in the Gulf or >Category 2 Storm Predicted to Affect N.O.

- Print out current tank gauge sheets:
  1. verify that the information is accurate
  2. Give the information to the SDC.
- Assist SDC in developing the skeleton-crew list of people to work this storm.
- Assist SDC in developing plans and priorities for shutdowns of all process units plus the wharf.
- Inspect all operating areas; pick up loose items or secure them.
- Pre-ship product where practical.
- Review water treatment chemical inventories; consider increasing to maximum inventory levels.
- Begin ballasting tanks where it does not prevent normal operations.
- Begin securing equipment throughout the plant.

Phase III Securing Plant and Shutdown of Process Units

- Ballast all empty tanks, when directed by the SDC.
- Consider taking pictures during storm preparations to document such things as equipment hook ups or unusual events.
- Shutdown process units as directed by the SDC.
- Keep a record of any unusual actions done to shutdown the process units. (This information will simplify start-up operations after the storm has passed.)
- Clear space in the Drumming Facility and/or the Maintenance Shop to park vehicles for the skeleton-crew.

Attachment C (Continued)
Operations Task List

- Ensure we have full diesel and gasoline storage tanks.
- Tie down gangways at the wharf facilities with straps or chains. Lock loading arms in the raised position by inserting the pins.

Phase IV Final Storm Preparations

- Shutdown B&S area.
- Stop railroad switch. Inform railroad representative to telephone the BS&U Shift Supervisor each morning to determine if a switch will be scheduled.
- Cancel inbound and outbound shipments of all trucks.

Phase VI Recovery

- Assess all operating areas; direct clean up and isolation as needed to ensure safe access.
- Develop priorities for drying out and restarting the plant.

Attachment D-1
Maintenance Task List

Storm Phases

Phase I	Pre-season preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weathering" the storm or Evacuate
Phase VI	Recovery

Weather Consultant

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Email: impact@univ-wea.com

Phase I Pre-Season Preparations (May 1-31)

- If directed by the SDC, place large capacity pump on stand-by (likely for the entire hurricane season).
- For the large capacity water pump, locate and inspect:
  1. fire hoses (3 runs at about 800 feet each)
  2. fittings for the hoses
  3. manifold that fits on the discharge of the large capacity water pump
  4. discharge manifold for the end of the hose runs at the edge of the river

  Make any necessary repairs or replace any items as needed.
- Review critical motor list; update as needed. Refer to **Attachment D-2.**
- For critical motors:
  1. check on-site inventory
  2. As needed, purchase or locate suppliers.
- Supply 1,000 sand bags, oil booms, and absorbent pads.
- Do inspection and repairs (as needed) to storm trailer.

Phase II Storm in the Gulf or >Category 2 Storm Predicted to Affect N.O.

- Assist Operations as requested for storm preparations.
- Assist SDC as requested for storm preparations.
- Set up the large capacity water pump at the forebay.

Phase III Securing Plant and Shutdown of Process Units

- For all items in **Attachment D-3**:
  1. obtain them
  2. store at the plant
  3. provide a list to the SDC showing where the items are stored

Attachment D-1
Maintenance Task List *(Continued)*

- Assist Operations as requested for storm preparations.
- Assist SDC as requested for storm preparations.
- Set up and connect emergency generators.
- With assistance from Technical, hook up generator for computer and telephone room.
- Ensure on-site fuel tanks are full:
  1. diesel
  2. gasoline
- String the hoses and install two discharge manifolds for the large capacity water pump.
- As needed or desired, place oil recovery booms around plant drains. Tie in place.

Phase VI Recovery

- Assist Operations and the Recovery IC in recovery activities.

Attachment D-2
Critical Motor List

Priority	Equipment #	Brass Tag #	Area	Horse Power	RPM	Frame
1A	P-7100	MP-5000	B&S	7.5	1170	254T
1A	P-7101	MP-952	B&S	10	1170	256T
1A	P-7102	MP-4072	B&S	25	1765	284T
1A	P-7107	MP-5046	B&S	25	1760	284T
1A	P-7108	———	B&S	10	1175	256T
1A	P-7109	———	B&S	10	1175	256T
1A	P-7116	MP-4403	B&S	15	1180	284T
1A	P-7117	MP-953	B&S	10	1170	256T
1A	P-7119	MP-5061	B&S	20	1755	256T
1A	P-7154	MP-986	B&S	30	880	364T
1B	71-MP-7103	MP-5047	B&S	25	1765	284T
1B	71-MP-7113	MP-5041	B&S	40	1775	X324T
1B	71-MP-7115	———	B&S			
1B	71-MP-7152	MP-984	B&S	10	1155	256T
1B	71-MP-7170	MP-4077	B&S	25	1760	284T
1B	71-MP-7190	MP-4584	B&S	5	1755	184T
1B	71-MP-7194	MP-1002	B&S	25	1760	284TS
1B	71-MP-7196	MP-1003	B&S	25	1775	284T
1B	71-MP-7198	MP-1004	B&S	25	1760	284TS
1B	71-MP-7214	MP-4001	B&S	7.5	1765	213T
1B	71-MP-7215	MP-5051	B&S	10	1755	L215T
1B	71-MP-7316	MP-5066	B&S	10	1725	215T
1B	71-MP-7322A	MP-3024	B&S	20	1750	286U
1B	71-MP-7329A	MP-4035	B&S	40	1780	324T
1B	71-MP-7330	MP-2855	B&S	25	1765	284T
1B	71-MP-7340	MP-4456	B&S	25	1765	284T
2	71-MP-7106	MP-4074	B&S	25	1170	284T
2	71-MP-7110	MP-5031	B&S	15	1170	284T
2	71-MP-7111	MP-5064	B&S	5	1160	215T
2	71-MP-7112	MP-4016	B&S	10	1170	256T
2	71-MP-7114	MP-356	B&S	25	1170	284T
2	71-MP-7118	MP-2609	B&S	25	1775	284T TE
2	71-MP-7120	MP-4015	B&S	10	1170	256T
2	71-MP-7121	MP-4012	B&S	10	1170	256T
2	71-MP-7142A	———	B&S	25	1765	284T
2	71-MP-7142B	MP-981	B&S	40	770	444T
2	71-MP-7150	MP-4000	B&S	10	1765	215T
2	71-MP-7153	MP-4379	B&S	20	1770	256T
2	71-MP-7155	MP-5003	B&S	20	1755	256T
2	71-MP-7156	MP-05	B&S	15	1770	254T
2	71-MP-7171	MP-4389	B&S	20	1765	256T
2	71-MP-7180	MP-2035	B&S	15	1465	254T
2	71-MP-7181	MP-5062	B&S	7.5	1750	213T

Attachment D-2
Critical Motor List *(Continued)*

Priority	Equipment #	Brass Tag #	Area	Horse Power	RPM	Frame
2	71-MP-7182	MP-4032	B&S	7.5	1755	213T
2	71-MP-7183	MP-4059	B&S	7.5	1760	L213T
2	71-MP-7184	MP-4060	B&S	7.5	1760	L213T
2	71-MP-7190	MP-4584	B&S	5	1755	184T
2	71-MP-7191	———	B&S	5	1730	184T
2	71-MP-7192	MP-4401	B&S	7.5	1755	213T
2	71-MP-7193	MP-4495	B&S	7.5	1760	213T
2	71-MP-7311	MP-5055	B&S	15	3530	254T
2	71-MP-7317A	———	B&S	40	1175	324T TE
2	71-MP-7317B	P-1502	B&S	40	1775	324T TE
2	71-MP-7322B	MP-4415	B&S	40	1780	324T
2	71-MP-7329B	MP-4019	B&S	40	1780	324T
2	71-MP-7331	———	B&S	25	1760	284T
2	71-MP-7341	MP-858	B&S	25	1760	284T
2	71-MP-7342	MA-4012	B&S	25	1170	284T
2	71-MP-7343	MP-4999	B&S	25	1765	284T
2	71-MP-7350	MP-4004	B&S	7.5	1765	213T
2	71-MP-7352	MP-1572	B&S	25	1765	284T
2	71-MP-7353	MP-1570	B&S	20	1770	256T
2	71-MP-7355	MP-1572	B&S	10	1765	256U
2	71-MP-7356	MP-1573	B&S	10	1760	215T
2	71-MP-7357	MP-4451	B&S	20	1170	286T
2	71-MP-7359	MP-4005	B&S	10	1765	215T
2	71-MP-7360	MP-5056	B&S	10	1750	215T
2	Common blend	———	B&S			
2	T-7115	———	B&S			
2	71-MA-7107	MA-3355	B&S	10	1765	215T
2	71-MA-7109	MA-4028	B&S	15	1770	254TZ
2	71-MA-7110	MP-5050	B&S	15	1770	254T
2	71-MA-7111	———	B&S			
2	71-MA-7113A	MA-4026	B&S	10	1750	215T
2	71-MA-7118	———	B&S			
2	71-MA-7121	———	B&S			L213T
2	71-MA-7172	———	B&S			L213T
2	71-MA-7344	———	B&S			184T
2	71-MA-7346	———	B&S			
2	Belt driver agitator	———	B&S			

Attachment D-3
Storm Threat Equipment List

Maintenance Department personnel shall acquire the following equipment:

- Flat boat, at least 16-ft long [1], Paddles [4], and life vests [3]
- Chevron portable welding units [5]
- Diesel powered air compressors - Two (2) portable 1750-cfm and one (1) 750-cfm with a dryer [3]
- *One portable high volume* (3000-5000 GPM), diesel-powered water pumps [1] (**Prime Equipment** is Oak Point's Alliance Partner; Boots and Coots can be used as an alternate supplier)
- Storage tanks (skid mounted) for diesel oil [6]
- Diesel-powered electric generators with electronic governors to run the two pumps at the Storm Water Basin (500 KW), the Maintenance Building (500 KW), the Technical/Office Buildings (250 KW), telephone system, computer back-up (250 KW) and one spare unit (1000 KW) [5]
- Drop cords and emergency lights for use with generators
- Six (6) diesel powered portable lights.

Attachment E-1
Human Resources Task List

Storm Phases

Phase I	Pre-Season preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weathering" the storm or Evacuation
Phase VI	Recovery

Weather Consultant

Storm updates from Universal Weather and Aviation, Inc.

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www:	http://www.ImpactWeather.com
Email:	impact@univ-wea.com

Phase I Pre-Season Preparations (May 1-31)

- Review all non-perishable items. Refer to **Attachment E-2.** Replace as needed.
- Give Storm Defense Coordinator key access to the storm trailer.

Phase II Storm in the Gulf or >Category 2 Storm Predicted to Affect N.O.

- Develop a plan to reestablish a full complement of security officers after the storm and provide it to the SDC.

Phase III Securing Plant and Shutdown of Process Units

- Remove non-perishable items from storage and put them in the Technical Center Conference Room. Refer to **Attachment E-2.**
- Move a medical trauma kit from the Oak Point Employee Health Center to the Technical Center Conference Room.
- Purchase the perishable items and bring them to the plant. Ensure the supplies are kept secure and store them correctly to prevent spoilage. Refer to **Attachment E-3**.

Phase VI Recovery

- Recover and store non-perishable items. Refer to **Attachment E-2.**
- Promptly repair or replace non-perishable items that are damaged or missing so they will be available for the next tropical storm.

Attachment E-2
Non-Perishable Supplies

During Storm Standby Status, Human Resources personnel should make sure that the following items are on hand and ready to use:

Equipment

R {

- Radio, "all band," battery-operated [1]
- Cellular phones
- Batteries for radio [20]
- Flashlights [20]
- Batteries for flashlights [2 sets for each-80]
- Propane lanterns [3]
- Propane stove [3]
- Matches, wood kitchen (for stove and lanterns)
- Polaroid Camera (or single use flash cameras) with 10 roles of film
- One gallon cans propane [3]
- Plastic funnels [2]
- Electric double hot plates [2]
- Life Vests [21]

Personal Hygiene

- Portable toilets [2]
- Toilet paper [96 rolls]
- Sponges [10]
- Face cloths [28]
- Bath towels [28]
- Buckets [6]

Sleeping

- Blankets [24]
- Pillows [24]
- Sheets [40]
- Pillow Cases [24]
- Bed frames [20]
- Mattresses [20]
- Sleeping Bags [20]
- AC/DC converter [1] }

Meals

- Food - Purchase new non-perishable foods
- Disposable Cups [1000]
- Ice chests [7]
- Coffee pot for Coleman stove [1]
- Paper towels [62 rolls]
- Trash bags, large plastic (for garbage) [100]
- Zip lock bags [12 boxes]
- Food containers [24 piece]
- 12 volt D/C ice chest [1]
- Miscellaneous cooking utensils
- Disposable plates, forks, spoons, knives

Attachment E-2
Non-Perishable Supplies *(Continued)*

Miscellaneous

- Snake-bite kits [6]
- Rope, ¼ in [1200 ft]
- Rope, 1/2 in [600 ft] (High visibility yellow or orange polypropylene rope for tag and safety lines.)
- Rain coats

R {
4 - Large
5 - X-Large
6 - Medium
8 - Small

- Hip Boots
  1 – size 9
  2 - size 10
  3 - size 11
  1 - size 14 }
- Rubber boots
  4 - size 10; 2 – size 12
  3 – size 11; 2- size 9
- 2 rolls yellow caution tape
- 1 roll "Do not Enter" tape

Attachment E-3
Perishable Supplies

Human Resources should acquire the following supplies (for 17 people for five days):

Food & Drink

- Bottled drinking water [265 gal]
- Coca Cola [5 cases]
- Diet Coke [5 cases]
- Gatorade powder mix [5 lbs.]
- Water container for Gatorade, 5 gal [2]
- Tea bags [50]

Personal Hygiene

Skeleton-crew members shall supply their own mouthwash, deodorant, bath soap, toothbrushes, toothpaste, dental floss, etc.

Attachment F
Technical Task List

Storm Phases

Phase I	Pre-Season preparations (May 1-31)
Phase II	Storm in the Gulf or a >Cat. 2 storm predicted to affect N.O.
Phase III	Securing plant and shutdown of process units
Phase IV	Final storm preparations
Phase V	"Weathering" the storm or Evacuate
Phase VI	Recovery

Weather Consultant

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Email: impact@univ-wea.com

Phase I Pre-Season Preparations (May 1-31)

- Collect existing or make hard copies of:
  1. Electrical one-line drawings
  2. CTN phone list

Place them in the drawing file room (second floor Technical Center).

- For the satellite phone:
  1. Locate it
  2. Verify it works

Phase II Storm in the Gulf of >Category 2 Storm Predicted to Affect N.O.

- Begin making full (100%) backup files every night for all computer systems.

Phase III Securing Plant and Shutdown of Process Units

- Ensure we have current and complete backup files for:
  1. Fischer Porter
  2. TI Star
  3. Honeywell
  4. all servers
  5. all VAX computers
- Identify I&E and computer personnel who will be available to assist early in Phase VI. Inform the SDC.
- Send full backup files to off-site storage daily.
- Secure all construction sites in the plant.
- Secure all contractors laydown areas.
- Assist Maintenance in hooking up generator to computer and telephone room.

Attachment F (Continued)
Technical Task List

Phase IV Final Storm Preparations

- Perform orderly shut down of all computer equipment including Fisher Porter, Honeywell, and TI Star after the equipment or its use is shutdown.
- Upon leaving the plant, send or take latest copy of all backup files to off-site storage.

Phase VI Recovery

Send I&E and computer personnel to the plant as soon as authorized by the Recovery IC.

Revisions are shown by R and { Text. }

Uncontrolled Document

APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
SAFETY SPECIALIST	HEALTH & SAFETY SUPERVISOR	AMERICAS REGION MANAGER
S. J. STUNTZ	G. A. CREEKMORE	M. H. BURNSIDE

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OPDMS

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Revisions are shown by R and { Text. }

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1.0 Introduction/Scope

This document covers the response required by Oak Point personnel in the event of an oil spill to the Mississippi River.

2.0 Procedures

2.1 Key Phone Numbers

Coast Guard	504 589-6261
Oil Spill Response Org. (OSRO's) Spill Clean-Up Contractors	U.S. Environmental Services 1-888-279-9930 Oil Mop 504-394-6110 Environmental Safety & Health 1-877-437-2634
OPA-90 Qualified Individual	Lawrence Hill Ex 6516 Home 341-7346, Pgr 504-544-9084 OR Philip Taylor Ex 6411 Home 504-656-2961
Environmental on Call	1-888-592-1566
BSU&E Section Supervisor: Enrique Llewellyn	Ex 6365 Hm 985 727-7854 Pgr 504-984-2345 OR 985-778-6952
Public Affairs: Matt Carmichael **OR** Brent Wood	Off 504 592-6432 HM 504 281-4781 Cell 504 908-6432 Off 504 592-6371 Hm 504 865-7895 Cell 504 908-6371
Manager on Call	www.bch.chevrontexaco.net/oakpointoncall/oncall.asp
Plaquemines Water Works / LEPC	(504) 682-0081 (24hr#)

NOTE: Environmental will contact NRC, State Police, Plaquemines Parish LEPC and LDEQ.

2.2 Key Forms and Emergency Response Resource Sheet

Attachment "1: GO-140, "Report of Oil and Hazardous Substance Release" (attached)

Attachment "2": Emergency Contact List and Emergency Response Resource Sheet (attached)

2.3 Key Issues to Remember

General

- For any oil spill (defined below) or when circumstances develop that are likely to cause an oil spill to the Mississippi River, the Oak Point Oil Spill Response Plan (USCG) must be implemented. This plan was prepared as required by the Oil Pollution Act of 1990 (OPA 90).
- Copies of the Oak Point Oil Spill Response Plan (USCG) can be found in the Environmental Department and in the BSU&E Section Supervisor's Office, Qualified Individual's Office, Alternate Qualified Individual's Office and the Wharf Control Room.
- The Environmental Department can be called on as necessary to assist with any phase of the Oak Point Oil Spill Response Plan (USCG) implementation.
- The definition of "oil" includes any liquid (or material that is a liquid upon heating) and that
  - can be burned and
  - is not soluble in water

  This includes all materials handled over the wharf.
- A spill or release of oil or chemicals containing oil to the river is defined as one of the following:
  - Creates a sheen on the river -- even a minor one along the bank
  - Exceeds 42 gallons
  - Has the potential for harming the environment
- Section 200 of the Oak Point Oil Spill Response Plan (USCG) denoted by a red tab titled "Emergency Response Action Plan" details the notification (implementation) procedures that should by carried out in the event of a spill. These procedures are summarized below.

2.4 Implementing the Oak Point Oil Spill Response Plan (USCG)

- Upon detection that oil has been spilled or is likely to spill into the Mississippi River, do the following to implement the Oak Point Oil Spill Response Plan (USCG):
  - Contact the BSU&E Shift Supervisor and advise the location of the release. The Shift Supervisor will then arrange for notification of all other personnel or agencies.
  - Notify U.S. Environmental Services to assist with the spill, if needed.
  - Estimate the size of the oil spill and be prepared to tell public agencies which one of these ranges the spill falls into:
    - ☐ Average Most Probable - up to 50 barrels
    - ☐ Maximum Most Probable - up to 1200 barrels

- ☐ Worst Case Discharge - greater than 1200 barrels

- Activate the Incident Command System, if needed.

- Contact Maintenance or activate the ERT, if needed, to immediately plug or patch a line leak.

- Notify the Area Operating Supervisor (O/S) using the Plant Night Phone Roster (during off hours). The O/S will notify appropriate Oak Point Managers, including the Manager-On-Call (posted on the On-Call listing).

- Notify Local Public Affairs as listed in the "Key Phone Number" section of this document.

- Notify Chevron Oronite Oak Point Plant Management. The Manager-on-Call, Americas Region Manager or delegated representative shall report the emergency to ChevronTexaco Management as outlined in the Emergency Response Manual (ERM) Document ERM-6.16

2.5 Implementing the Oak Point Oil Spill Response Plan (USCG)

- Notify Chevron Corporate "Emergency Response Staff Contacts" for any spill in the Mississippi River that may be environmentally sensitive or newsworthy. Upon request, the "Emergency Response Staff" can assist in securing emergency assistance from internal or external resources. Phone numbers are located in Attachment 2.

- Phone appropriate key agencies: **(Mandatory For Any Oil Spill to the Mississippi River)**

  - Eighth Coast Guard District New Orleans Pollution Control Office (504) 589-6261. Give the following information:

    - River Mile: Mile 72 from the River Delta, West Bank
    - Address: 10285 Highway 23, Belle Chasse, LA 70037
    - Cause of release
    - Estimated quantity released
    - Type of material spilled
    - Cleanup measures (spill boomed/not boomed)
    - Additional cleanup services (if used)

  - Plaquemines Waterworks (504) 391-2386
  - Chevron Shipping Co. (CTEIC) (713) 754-3018
  - National Response Center 1-800-424-8802
  - Louisiana Department of Environmental Quality (225) 342-1234
  - Louisiana State Emergency Response Commission (504) 925-6595

- Activate contract laborer call-out system, if needed.

- Phone additional Contractors listed in the Oak Point Oil Spill Response Plan (USCG) and in the "Key Phone Number" section of this document, if additional assistance is needed.

- Complete form GO-140 ("Report of Oil and Hazardous Substance Release")

3.0 Definitions

None.

4.0 References

None.

5.0 Records

Obsolete copies of this procedure shall be archived in the OPDMS in accordance with Corporate retention guidelines. Requests for review copies of documents in Archive Status shall be made in accordance with PI-113.

Record of Revisions and Reviews

Page	Revision	Date	Comments
1-6(2)	1.00	12/1993	Creation of procedure.
1-6(2)	1.01	05/1994	Misc. revisions.
1-6(2)	1.02	O6/1995	Misc. revisions
1-6(2)	1.03	12/1995	Add misc. references to OPA 90 and USCG.
1-6(9)	1.04	01/1999	Add misc. revisions throughout document.
1-5(8)	1.05	07/30/2004	Review of ERM completed; updated names and signatures, application of new format.

(#) = Number of attachment pages

6.0 Attachments

Attachment 1 - GO-140, Report of Oil and Hazardous Substances Release
Attachment 2 - Emergency Response Resource Sheets.

Attachment 1

Report of Oil and Hazardous Substances Release GO-140

ChevronTexaco

Report Number _____

Reporting Company

Department/Division

Facility Location

Incident Location

Material Spilled/Released/Leaked

☐ Spill/Release
☐ Discovery of Underground Contamination

Date of Release or Discovery

Time ☐ AM ☐ PM

Receiving Medium(s)

☐ Air ☐ Ground Water
☐ Land ☐ Subsurface
☐ Paving ☐ Lined Impoundment
☐ Deck ☐ Unlined Impoundment
☐ Surface Water

Release Confined to Company Property?
☐ Yes ☐ No

Reported to the Following Government Agencies	Name of Person Reported To	Name of Company Person Who Made Report	Reported Date / Time
☐ National Response Center			/
☐ U.S. Coast Guard			/
☐ EPA Regional Office			/
☐ State Agency – Name:			/
☐ Other – Name:			/
☐ Not Reported to a Government Agency			

Quantity Released as: / **Quantity Recovered***

Crude		Gal.		Bbl.
Produced Water		Gal.		Bbl.
Refined Product		Gal.		Bbl.
Produced/Natural Gas		MSCF		
Hazardous Substance		Lbs.		Tons

(☐ CERCLA "Reportable Quantity")

*Removed from the Environment

Notice of Violation
☐ Yes ☐ No ☐ Not Known at This Time

Estimated Cleanup Costs

Estimated Damages

Source

Vessel/Barge - Name

Offshore Platform – Name or Number

Service Station - Number

☐ Tank Aboveground ☐ Hull Leak ☐ Process or Pumping Equipment ☐ Well
☐ Tank Underground ☐ Sump ☐ Stack, Flare
☐ Tank Truck ☐ Pipeline/Flowline ☐ Unknown
☐ Tank Car ☐ Piping ☐ Other

Cause(s)

☐ Human Error ☐ External Corrosion
☐ Faulty Procedure ☐ Internal Corrosion
☐ Mechanical Failure ☐ Act of God
☐ Design Malfunction ☐ Non-Company
☐ Unknown ☐ Other

Describe how release occurred or how it was discovered and any effect it may have had on other's property. Discuss the degree of public, press or regulatory attention. Identify the company or contractor involved in non-company releases.

escribe assessment and remedial action taken and planned, and the disposal method of recovered material (if any).

Action Taken to Prevent Recurrence (if applicable).

Witnesses to Spill – Name	Company	Address (of Non-Chevron Witnesses)

Report Prepared By	Date	Report Approved By	Date

Attachment 1 (Continued)

Instructions

Form GO-140 should be prepared as completely as possible and may include supplementary pages, photographs or sketches if applicable. Personal observations are an important part of the report; however, statements should be brief and factual and devoid of speculation.

Only certain categories of spills, leaks and discoveries of underground contamination require that a GO-140 be prepared. If you have any questions concerning whether the form should be filled out or not, please consult with your environmental compliance representative.

One copy of this report should be sent to the Corporate Manager, Compliance (Environment, Safety, Fire and Health), if required, along with the quarterly environmental, safety, fire and health compliance report. Other copies should be prepared and distributed according to management practices.

Certain spills and releases require immediate reporting to a government agency. Also, spills and releases considered to be "serious" should be reported to the Corporation within 72 hours. If you are unsure whether an incident should be reported, please consult with your environmental compliance representative. When in doubt, report. The incident may require reporting to more than one government agency.

Reporting to the National Response Center (800-424-8802) is required for certain releases of hazardous substances and for any release of oil which reaches, or causes a sheen on, public waters. Releases to the environment of hazardous substances must be reported if the amount of material released is equal to or exceeds its CERCLA "reportable quantity." Oil spills to water are allowed in some instances to be reported to a local U.S. Coast Guard office instead of the National Response Center. Please consult with your environmental compliance representative for more information.

For hazardous substances releases, calculate the amount in pounds or tons of the hazardous substance. For example, a 10 bbl spill of 90% sulfuric acid yields 5712 lbs of H_2SO_4. The same size spill of 20% sulfuric acid yields only 798 lbs of H_2SO_4.

ATTACHMENT 2

EMERGENCY RESPONSE RESOURCE SHEETS

EMERGENCY CONTACT LIST

Per the Guiding Principles for oil and chemical spills, the Emergency Response Staff and Public Affairs must be notified of spills that may be environmentally sensitive or newsworthy even if at the local level. Upon request, the Emergency Response Staff can assist operating companies in securing emergency assistance from the company resource teams and external emergency resources, such as consultants.

EMERGENCY RESPONSE STAFF CONTACTS

Office (San Ramon)

Ron Holten	(925) 842-7415	Emergency Response Manager
Dan Hemker	(925) 842-7413	Emergency Response Advisor
Bill Rogers	(925) 842-7429	Emergency Response Advisor
Paula Vanderlander	(925) 842-7434	Emergency Response Advisor

Office (New Orleans)

Larry Stratmann	(504) 592-6270	Emergency Response Manager
Dave Davidson	(504) 592-6278	Emergency Response Advisor
Connie Broadman	(504) 592-6272	Emergency Response Technician

Alternatively, you may contact the CTEIC:

Inside the U.S., dial 1-800-231-0623
Outside the U.S., dial 1-510-231-0623

PUBLIC AFFAIRS EMERGENCY CONTACTS

To notify Public Affairs, contact your local Public Affairs representative. In his or her absence, notify the Public Affairs Emergency Contact by 24-hour pager: 415-807-9184. After the beeping stops: enter the area code and phone number for them to call, press the # key, then hang up.

ATTACHMENT 2 (Continued)

EMERGENCY RESPONSE RESOURCE SHEET

INTERNAL — **ADVISORY & RESOURCE TEAM**

DESCRIPTION:

The Chevron Texaco Emergency Response Organization can provide expert advice during the initial stages of an incident and assist in marshalling a wide variety of internal and external resources as needed. The team is composed of a management representative from the impacted operating company and experts in emergency response, ecology, law public affairs, safety and health, and if needed, marine transportation.

Upon arrival on-scene, the team will immediately report to the Incident Commander to more thoroughly explain its function and capabilities and offer its services.

HOW TO USE:

To activate the team, contact the Emergency Response Staff (see call-out list).

Team members are pre-authorized to respond to a request from operating company or corporate management. They are prepared to arrive at their local commercial airport within two hours of notification.

ADDITIONAL INFORMATION:

The ChevronTexaco Emergency Response Organization is organized to function only during the initial stage of an incident. As the response progresses, the responding organization may request individual members to become part of the local response team.

Team members who may respond to foreign incidents are prepared to travel internationally on short notice. They have passports and inoculations recommended by the Medical Staff.

The emergency response, safety and health, and ecology team members have received the required level of HAZWOPER training for their expected duties.

ATTACHMENT 2 (Continued)

EMERGENCY RESPONSE RESOURCE SHEET

INTERNAL — **FUNCTIONAL TEAMS**

DESCRIPTION:

Twelve Functional Teams are available to provide expert, specialized services that are essential to support a response organization. Each team has developed a ready organization to assist an operating company in responding to incidents worldwide. Functional Teams may assemble at the incident site and/or at the operating company's headquarters or other facility. Functional Teams are augmented by contract personnel or consultants when necessary to assure worldwide coverage expertise.

The 12 Functional Team are:

Communications	Law
Comptroller's	Public Affairs
Environmental	Purchasing
Facilities	Safety, Fire & Health
Human Resources	Security
Insurance/Claims	Transportation

Operating companies may activate one or as many people they feel they need for the response. When activated, team members will report to and work directly for the organization handling the incident.

HOW TO ACCESS:

To activate the Functional Teams, contact the team leaders directly (see the Functional Teams call-out list) or the Emergency Response Staff (see Emergency Response Stall resource sheet).

Team members are pre-authorized to respond to a call from any operating company and are prepared to arrive at their local commercial airport within 24 hours of notification.

ADDITIONAL INFORMATION:

Team members are prepared to travel internationally. They have passports and inoculations recommended by the Medical Staff.

Team members who may work in the field during spill response have received the required HAZWOPER training for their expected duties.

ATTACHMENT 2 (Continued)

EMERGENCY RESPONSE RESOURCE SHEET

INTERNAL **FUNCTIONAL TEAMS continued)**

TEAM SERVICES: The emergency response support services which the Functional Teams can provide are summarized below.

Communications: Set-up and operation of an integrated communications network using radios, telecommunications, and other technology.

Comptroller's (Finance): Accounting, cost control, office support functions.

Environmental: Environmental impact assessment, permitting, modeling, environmental monitoring, wildlife rescue and rehabilitation, response and remediation technology (dispersants, solidifiers, bioremediation), waste management.

Facilities: Offices, warehouses, housing, potable water, food, and sanitation facilities.

Human Resources: Staffing of the response team, direct human resources services to response team members, emergency relief assistance to affected parties.

Insurance/Claims: Receive and resolve third-party injury and property damage claims, management of insurance-related matters.

Law: Advice on actual and potential legal and liability actions from governmental agencies and third parties, verify compliance with legal requirements, and other legal support.

Public Affairs: Media relations, press releases, government agency and community leaders interface, advice on communication to the public, volunteer referrals.

Purchasing: Procurement and storage of equipment and material management.

Safety, Fire & Health: Technical advice and direct field support on safety, industrial hygiene, fire protection, toxicology, media support to response personnel and medical liaison with community public health authorities.

Security: Liaison with local law enforcement, site security, guard services, site access control, theft prevention, personal security.

Transportation: Transportation for personnel, equipment and supplies.

ATTACHMENT 2 (Continued)

EMERGENCY RESPONSE RESOURCE SHEET

INTERNAL — **WORLDWIDE SPILL RESPONSE TEAM**

DESCRIPTION:

Worldwide Spill Response Team (WWSRT) members are on-call to fill and provide backup for key spill response and cleanup management positions. The team is a select group of about 30 experienced and highly trained individuals from the spill response organizations of the various operating companies.

Operating companies may activate one or as many people they feel they need for the response. When activated, team members will report to and work directly for the operating company handling the incident.

HOW TO USE:

To activate WWSRT members, contact the Emergency Response Staff (see call-out list).

Team members are pre-authorized to respond to a call from any operating company and are prepared to arrive at their local commercial airport within six hours of notification.

ADDITIONAL INFORMATION:

All team members are prepared to travel internationally on short notice. They have passports and inoculations recommended by the Medical Staff.

The team members are also certified as having at least received Level 5 (Incident Commander), Low Hazard Worker, and Management/Supervisor HAZWOPER training.

ATTACHMENT 2 (Continued)

CHEVRON CORPORATE EMERGENCY RESPONSE TEAMS

When the Chevron Corporate Emergency Response Staff is notified of an oil spill emergency, any of the following key teams may be mobilized at the Operating Company's (OPCO's) request:

- Advisory and Resource Team
- Functional Teams
- Worldwide Spill Response Team

These teams are designed to work for the OPCO with the OPCO's emergency response management system and not to take over the response, unless requested to do so. Listed below are the main characteristics of each team and how they inter-relate:

ADVISORY AND RESOURCE TEAM

- Their job is to provide spill clean-up advice, resources and a communication link back to Corporate management.
- For Oak Point, they are composed of a Chevron Chemical Management representative, a member of the Emergency Response Staff and selected Functional Team members (to be discussed next).
- They are designed to be a quick response team. Their bags are packed and they are ready to go within two hours. Practically, they are about six hours away from Oak Point, because they are West Coast based.
- During the initial emergency, they are designed to operate outside of the Incident Command System (ICS) framework as advisors.
- Later, they can be disbanded and put into the OPCO ICS framework.
- They do not get directly involved with the oil spill clean-up activities.

FUNCTIONAL TEAMS

- They are designed to provide specialty support services such as:
  - Communications
  - Environmental
  - Public Affairs
  - Human Resources
  - Finance
- Team members are located in strategic locations throughout the U.S. and the world. The Chevron Corporate Emergency Response Staff would preferably arrange for Gulf Coast Functional Team Members to assist at the Oak Point site.
- Functional Teams are designed to work within the OPCO ICS framework.
- Like the Advisory and Resource Team, they do not get directly involved with the oil spill clean-up activities.

WORLDWIDE SPILL RESPONSE TEAM

- They are designed to be an experienced manpower pool to supervise oil spill clean-up contractors, to assist in clean-up planning activities, or to manage a complete spill clean-up effort.
- They are designed to fit under the OPCO'S Operations Planning or Logistics Officer with in the ICS framework.
- They get directly involved with spill clean-up activities.

Chevron ORONITE Oak Point Plant	Oak Point Emergency Response Manual Plant Flooding	ERM-6.14 Rev: 1.03 Application Date: 07/30/04 QAR Document Code: N/A Page 1 of 3

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APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
SAFETY SPECIALIST	HEALTH & SAFETY SUPERVISOR	AMERICAS REGION MANAGER
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1.0 Introduction/Scope

The purpose of this document is to establish procedures to be implemented in the event of general plant flooding.

2.0 Procedures

- Acquire one or two diesel - powered water pumps, with a minimum capacity of 4000 GPM each at 100 – 120 psi discharge pressure. The amount and size of extra hose will be determined at time of order.
- Rental pumps will be used for flood control purposes.
- Pump Rental - Purchasing will handle from available sources. For off-hours, Operations will handle through the On-Call Foreman.
- Ensure there is an adequate supply oil containment booms (oil floats out of drains).
- Purchasing will handle doubling the inventory of sandbags, rubber boots and hip waders in the plant.
- If possible, pull pump motors in low areas of BSU&E. Monitor low areas in Continuous for possible motor removal.
- Check with local motor-vendors to make sure miscellaneous back-up motors are in stock.
- Monitor 13.8KV switches and MCC's in low areas (BSU&E) and de-energize before water gets to energized components.
- Sandbag the Gate 2 (block off) entrance.
- Sandbag the rails along each side of the Gate 3 entrance to prevent travel of water along the tracks.
- Consider safe access and affects on operating equipment when deciding which plants and equipment to keep operational as areas of the Plant begin to flood.
- Periodically, check the levees around the landfills for leaks because we are obligated to maintain containment.
- Security will monitor Gates 1 and 3 parking lots for rising water so cars can be moved before flooding. Security will contact each Manager/delegate by phone or radio noting the parking lot number and specific areas that are starting to flood. Voice Mail Messages are not acceptable. The Managers/ delegates will then handle overall Plant personnel notifications. Employees/Contractors will make arrangements to move their own cars to higher ground.
- Minimize foot traffic into plant areas that are flooded. Be careful to avoid tripping if you must wade into water. If you have to work in deep water, use the "buddy system".
- Exercise care when riding bicycles in plant areas that have standing water. Minimize vehicle travel in flooded areas.
- For hurricanes, a Storm Defense Coordinator (SDC) is assigned to manage storm preparation and recovery activities. Refer to Document ERM-6.12, Storm Threat Procedure for more details.

3.0 Definitions

None.

4.0 References

None.

5.0 Records

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Record of Revisions and Reviews

Page	Revision	Date	Comments
1-2(0)	1.00	07/1993	Creation of the procedure
1-2(0)	1.01	06/1995	Miscellaneous revisions
1-2(0)	1.02	01/1999	Miscellaneous revisions
1-3(0)	1.03	07/30/2004	Review of ERM completed. Applied new format.

(#) = Number of attachment pages

6.0 Attachments

None.

Chevron ORONITE Oak Point Plant	Oak Point Emergency Response Manual Media Relations	ERM-6.15 Rev:1.07 Application Date: 07/30/04 QAR Document Code: N/A Page 1 of 6

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1.0 Introduction/Scope

Emergencies at the Oak Point Plant can pose a threat to people, property, and the environment. They may wind up tarnishing our reputation, along with the reputations of Chevron Oronite Company and ChevronTexaco Corporation. Emergencies require the use of a trained spokesperson whenever the media is involved. The role of the Oak Point Spokesperson is to control the flow of information to meet the media needs and to minimize any damage to our reputation.

Emergencies, by their very nature, are usually traumatic and emotional for most people. Local communities and their leaders may feel threatened, fearful, angry, insecure, confused, betrayed, or abandoned. The Oak Point Spokesperson should try to calm any fears or concerns generated by the incident. The Oak Point Spokesperson can accomplish this by speaking factually about the incident.

During an emergency, our image -- hero or villain -- will hinge on how well we communicate with our employees and their families, the media, our neighbors, public officials, and governmental agencies.

As is pointed out in Attachment 3, the media are NOT our real audience. Our real audiences are our customers, neighbors, employees and their families, stockholders, special-interest groups, legislators and regulators, and the Public in general. Therefore, ANY ChevronTexaco employee representing Oak Point should be guided by the procedures and guidelines in this document.

During an emergency response, Oak Point designates only one person at a time to the role of Oak Point Spokesperson. (Refer to Section 2.1 for more information.) However, during emergency responses and during normal times as well, other Oak Point personnel may find themselves being interviewed by the media. For example:

- Reporters may interview Oak Point employees for their expertise or for eyewitness information.
- Representatives of the media or governmental agencies may phone the Oak Point Plant at anytime looking for information. They shall be referred to one of the Oak Point Managers or some other Oak Point employee with the necessary information to answer questions.
- Members of the Public may phone our HELPLINE looking for information.

Therefore, virtually all ChevronTexaco employees should be aware of and follow the guidelines in this document.

NOTE: During emergencies, the HELPLINE should be manned at all times and calls referred to the Oak Point Spokesperson(s). See details of HELPLINE use in the Field Reference Section of the Emergency Response Manual.

2.0 Media-Relations Procedure

2.1 Designated Spokesperson

The Oak Point Spokesperson shall make sure that receptionists and security people know:

- That he or she is the designated spokesperson.
- How to relay all media inquiries to him or her.

<u>Category One & Category Two Emergencies</u>

During normal business hours, one of the following people will normally assume the role of Oak

Point Spokesperson:

- Americas Region Manager
- Operations Manager
- ChevronTexaco Public Affairs representative

Outside of normal business hours, the ICS Staging Officer will normally assume the role of Oak Point Spokesperson

Category Three Emergencies

The EOC Information Officer will normally take over the role of Oak Point Spokesperson from the Staging Officer.

The Oak Point Plant considers its relations with the media to be one of the most important things to deal with during an emergency response. Oak Point ranks cooperation with the media third in importance behind:

- The safety of people
- An effective emergency response

ChevronTexaco's policy is: We will cooperate with the media but under controlled guidelines. As a general rule you should refer media personnel to the Oak Point Spokesperson. However, if an Oak Point Manager asks you to talk to the media, you should follow these guidelines:

- Do NOT give out confidential or proprietary information.
- Make sure that you have the authority to give your expert opinion to the media.
- If you have not been adequately briefed or you are not technically qualified to answer a question, then say so and find someone else who can give a competent answer.
- Provide only the facts; do not speculate under any circumstances; do not get drawn into hypothetical discussions and remember that it is acceptable to answer "I do not know, but I will find out for you."

2.2 Spokesperson Training

Oak Point's current plan under the CAER Code "Employee Training" requires that the following people receive training in "crisis communications":

- Oak Point Managers
- ICS Staging Officer

The following people should receive initial training and refresher training as needed:

- Americas Region Manager
- Operations Manager
- Technical Manager
- Maintenance Manager
- Human Resources Manager
- Lab Shift Supervisors

2.3 Preparing for the Media or Public Officials

Plant Security

Plant Security personnel must be aware of the following issues related to media or public official visits during an emergency:

- Security personnel assigned to gate duty must use communication equipment with headphones or earphones so that the media or public officials cannot hear emergency transmissions.
- Security personnel assigned to gate duty should immediately and courteously explain to anyone who asks, including the media or public officials, why the plant gates are closed and locked:

  REASON: Strictly for Safety to keep gates clear, to control the flow of emergency vehicles and personnel in and out of the plant, and to account for all personnel in the plant.
- Security personnel shall courteously instruct the media and public officials to go to the "designated gate" where the Staging Officer or other media trained personnel will meet them and serve as their host and Oak Point Spokesperson.
- Security personnel should immediately notify the Staging Officer/Oak Point Spokesperson of the arrival of the media or public officials.

NOTE: Security should not allow the media or public officials inside the gate until the Spokesperson arrives.

NOTE: Security personnel interaction with the media should be kept at a minimum since they are not media trained.

Spokesperson (Host)

The Oak Point Spokesperson should carry out the following duties for the benefit of the media representatives:

- Provide a safe place to gather -- including access to phones, coffee, soft drinks, food, etc. Suitable places:
  - Oak Point Learning Center (OPLC)
  - Purchasing or Maintenance Office conference room
  - Small Conference Room in Main Office Building
- Obtain the "media packet" (See Attachment 5) and use it with the media or public officials. The purpose of this effort is to provide general information about Oak Point and to allow time to gather information about the emergency or for getting assistance from other trained media personnel.
- Immediately get name of media person, who they represent and then notify Public Affairs.
- Make himself or herself continuously available to serve as host and escort.

Caution:	Do not allow the media or public officials to listen in on radio conversations. This may mean that you have to turn your radio off in their presence.

Caution:	Do not allow the media or public officials to be left unattended (i.e., don't leave them alone in a conference room). This is a critical job that needs your undivided attention.

2.4 Prepare an Account of the Emergency

The Oak Point Spokesperson may want to prepare a written, factual account of the incident as an aid in dealing with the media. See Attachment B, "How to Prepare a Factual Account." A worksheet is provided with the attachment to assist in preparing information for verbal transmittal to the media or public officials.

This written factual account should NOT be handed out to the media. If something of this sort becomes necessary, ChevronTexaco Public Affairs will issue a News Release.

The Oak Point Spokesperson should NOT release the following information to the media:

- Names of Chevron Oronite employee casualties should NOT be released until their families have been notified.
- Names of non-Chevron Oronite employee casualties should NOT be released. The Oak Point Spokesperson should instead give out the names of, and refer any further questions about the casualties to, the non-Chevron employers of the casualties.
- Names of other casualties should also NOT be released. The Oak Point Spokesperson should refer reporters to law enforcement and other agencies for this type of information.

3.0 Definitions

BSU&E = Blending, Shipping, Utilities & Ecology

EOC = Emergency Operations Center

GPM = Gallons per Minute

Media = Agencies of mass communications; e.g., magazines, newspapers, the news services, radio and television.

OPLC = Oak Point Learning Center

4.0 References

Communicating in a Crisis. San Francisco: ChevronTexaco Corp. Communications

5.0 Records

Obsolete copies of this procedure shall be archived in the OPDMS in accordance with Corporate retention guidelines. Requests for review copies of documents in Archive Status shall be made in accordance with PI-113.

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Record of Revisions and Reviews

Page	Revision	Date	Comments
1-7(3)	1.00	10/1993	Creation of the procedure.
1-7(3)	1.01	12/1993	Misc. revisions.
1-10(15)	1.02	06/1995	Misc. revisions.
1-10(15)	1.03	12/1995	Updated attachment "D" – Media Trained Personnel
1-10(15)	1.04	07/1996	Updated attachment "E" – Media Packet Contents
1-1(15)	1.05	03/1997	Updated section 4.3 and attachment "D" – Media Trained Personnel
1-10(15)	1.06	01/1999	Updated attachment "D" – Media Trained Personnel
1-6(10)	1.07	07/30/2004	Review of ERM completed, updated names and signatures, miscellaneous revisions to attachments; update of Attachment 4 – Media trained personnel and application of new format.

(#) = Number of attachment pages

6.0 Attachments

Attachment 1 - *Oak Point Plant Backgrounder/Fact Sheet*
Attachment 2 - *How to Prepare a Factual Account*
Attachment 3 - *How to Handle Questions from the Media*
Attachment 4 - *"Media" Trained Personnel*

Attachment 1

Oak Point Plant Backgrounder / Fact Sheet

- **Oak Point Plant**, P.O. Box 70, Belle Chasse, LA 70037. Tel: (504) 394-4320. Operated by Chevron Oronite Company LLC.
- **ChevronTexaco Corp.**, San Ramon, CA

Plant Site & Locality
- Plant sits adjacent to the Mississippi River levee, on 100-acre site, in southeast corner of Belle Chasse.
- State Highway 23 and Union Pacific railroad run along west side; 20-ft high levee runs along east side. Plant's wharf sits at edge of river batture.
- Mississippi River: more than a mile wide; shipping channel more than 150 feet deep.

Principal Business Activity
- One of world's largest producers of additives for lubricants and fuels. Additives improve lubricant and fuel performance. Used for wide range of equipment: oceangoing tankers and locomotives, automobiles and trucks, motorcycles and lawn mowers.
- Products normally supplied to customers as packages of blended additives. More than 350 different packages sold in United States and in international markets.

Plant Facilities
- **Storage:** approximately 400 tanks, from 5 to 800 thousand gallons.
- **Shipments:** 35 percent goes out on railroad tank cars. Other shipments go out on tanker trucks, oceangoing vessels, and on semitrailers and container ships in 55-gallon drums. Raw materials arrive via the same transportation.

Environmental, Health, and Safety
- **Control of Water Pollution.** Three systems control water pollution. They comply with federal and state standards.
  (1) Rainfall (70 inches annually) gets treated in a 7-million-gallon basin before being released to the river.
  (2) Pipeline (18-inch diameter) draws up to 7,200 GPM from river. Used as cooling water. Then checked for contaminants and discharged back into the river.
  (3) Process water from production cycle. First treated, then injected deep underground.
- **Control of Air Pollution.** Incinerator/scrubber was installed in 1977 (145-foot stack with steam plume). Burns vent gases. All solids and liquid wastes are disposed of off-site.

Work Force
- Chevron Employees: 350 (2004).
- Contract Personnel: 120 (2004).
- Plant operates 24 hours a day, 365 days a year.
- Manufacturing and Laboratory: two 12-hr work shifts per day, every day.
- Normal business hours: 7:00 a.m. to 4:30 p.m., M-F. Office closed holidays.
- Gate No. 3: always open and manned by security guards.

Security
- Uniformed security officers patrol fence lines, guard Plant gates, watch over installations, manage parking lots, and answer incoming phone calls outside of normal business hours.

Revisions are shown by **R** and { Text. }

Attachment 1 (Continued)

Emergency Response Preparation

- On-site (50) member Emergency Response Team.
- Quarterly Training Program for all ERT members.
- Training program for emergency response procedures.
- Detailed emergency response plans and preparations.
- Large-scale emergency response drills held once a year.
- Emergency Response Vehicle (ERV) for on-site plant use; rarely responds off-site. Packed with emergency response equipment. Equipped with foam-spreading unit: 100-gallon tank for foaming agent; two 95 GPM discharge lines. HAZMAT Response Equipment. Fire Fighting Protection Equipment. Rescue & Medical Supplies. Cellular mobile phone.
- Rapid Response Vehicle (RRV) serves as quick intervention fire truck. Contains 350 gallons of water with a 350 GPM pump. Also contains various fire fighting equipment including foam.

Historical Background

- **Pearl Harbor, 1941.**
- **San Francisco, 1941**. Lube-oil additives for U.S. submarines made only one place: Standard Oil of California's Richmond Refinery, on the California coast. Vulnerable to attack.
- **Washington, D.C., 1941-42**. Navy wants a second production site located on Gulf coast. Navy tells Socal to build it. Socal chooses site of old Oak Point Plantation on Mississippi River.
- **Oak Point Plant, 1943**. Begins operations. Makes lube-oil additives for U.S. diesel-engine submarines. Original plant occupies 45 acres; employs 125 people. All production goes for war effort.
- **Oak Point Plant, after WW II.** Production switches to meet needs of Socal and others.
- **Oak Point Plant, 1960s & 80s**. Major plant expansions.
- **Oak Point Plant, 1990s** to present. Largest modernization and expansion program in plant's history. $160-million projects package.

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Attachment 2

How to Prepare a Factual Account

1.0 Gather enough information to answer the following questions:

- What happened?
- When did it happen?
- Where did it happen?
- What caused the incident? (Don't speculate.)
- Who was involved?
- What is being done now?
- Is there any danger to employees or the community?
- What is being done to contain the danger?
- Is the problem under control?
- Was anyone killed or injured? (Don't release names.)
- What is the status of injured personnel?
- How long will it be before things are back to normal?
- What was the extent of the damage?

2.0 Write a factual account of the incident.

Answers to the preceding questions will supply you with the information you need to prepare a factual account of the incident. Include as much detail as possible. If you don't have a particular piece of information (e.g., the cause of the incident), don't speculate. Write only what you know to be true. Focus strongly on the action steps being taken to secure personnel, the community, and the environment.

3.0 Use your written account to inform the media, but do NOT hand it out. Hang on to your written account of the incident. ChevronTexaco Public Affairs will issue a News Release, if necessary. (The ICS Staging Officer normally arranges for someone to contact ChevronTexaco Public Affairs.

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Attachment 2 (Continued)

Emergency Fact Worksheet

1. What happened?_____

2. When did it happen?_____

3. Where did it happen?_____

4. What caused the incident? (Don't speculate.)_____

5. Who was involved?_____

6. What is being done now?_____

7. Is there any danger to employees or the community?_____

8. What is being done to contain the danger?_____

9. Is the problem under control?_____

10. Was anyone killed or injured? (Don't release names.)_____

11. What is the status of injured personnel?_____

12. How long will it be before things are back to normal?_____

13. What was the extent of the damage?_____

Attachment 3

How to Handle Questions from the Media

You will not need the skills necessary to host a talk show, but you will need the ability to convey simple and concise messages in non-technical language. Ours is a highly complex business, and our technical vocabulary is foreign to most people. Use plain English.

First and foremost, concern yourself with what the PUBLIC will think after hearing what you have to say. Make what the Public will think your chief concern -- NOT what your boss, peers, family, and friends will think.

Take time to prepare yourself mentally. Stay cool. You're the expert.

With this in mind, study the following four topics. This should enable you handle all questions posed by reporters.

1.0 Know What the Media Needs

Most reporters covering our emergency incident will be general-assignment reporters. They will not know much about our facility or its processes. Therefore, they will not ask very many technical questions. Be patient and explain things in non-technical language.

Keep in mind that reporters are trained to have a healthy skepticism about the people they interview and the stories they hear. They are paid to ask tough questions. When they face evasive or confused spokespersons, their questions get tougher and their skepticism keener. So be prepared.

Make sure you give them the latest information right away. The media often have tight deadlines for newscast preparation. This will avoid errors and conflicting reports.

Reporters will not need lots of information in the beginning. They will understand that our number-one priority will be to deal with the emergency:

- First -- to make sure that all of the people involved are safe.
- Second -- to control the problem.

Remember that you may know that we have operational control of the situation; but others, especially media people, might get a different impression based on what they hear and see and smell -- unless you keep them properly informed.

If media people get the idea that things are out of control and report it that way, then we really will have a problem.

TV and still-camera photographers need pictures for their stories. Try to get them close enough to the emergency scene to get their "visual aids." But do this only if it can be done safely. If it can't be done safely, explain why. Stress the safety hazards. Tell them that they will be escorted to the scene but only as close as safety permits. Tell them that they will have to comply with the directives of their escort.

2.0 Anticipate Questions

Make a list of likely questions; then prepare your answers. Reporters are taught to ask *who*, *what*, *where*, *when*, *why* and sometimes *how*. Be able to respond quickly to such questions as the following:

- What happened?
- Is there any danger to the surrounding communities?
- What are you doing to contain the danger?

Attachment 3 (Continued)

- Is the problem under control?
- Was anybody injured or killed?
- What caused the incident?

Prepare for difficult questions:

- Who will pay for this cleanup?
- Will this adversely affect the environment?
- So-and-so says ChevronTexaco could have prevented this incident if they had only taken the proper precautions. What's your response? Whose fault is this?

Anticipate hypothetical -- *What if?* -- questions, but do NOT try to answer them directly. Instead, respond in terms of the present incident.

In preparing your answers to such questions, remember that the media are not your real audience. The media are merely the route by which your message passes to the real audiences: customers, neighbors, employees and their families, stockholders, special-interest groups, legislators and regulators, etc. Think of their needs and wants and gear your message to them. Satisfy their concerns.

3.0 Use Message Sound Bites

Because of the nature of their business, reporters will tend to reduce your story to sound bites. Your taped interview with radio or television reporters may last several minutes or longer, but they will end up using only 10-20 seconds (the sound bite).

Therefore, try to do two things:

1. Choose what sound bites (key points) you want the media to pass on to the public. These "bites" should be statements of action in response to the emergency.

2. Provide those key points, by repetition, to the people of the media.

Boil down your message to a 20-second sound bite (about 70 words). Your sound bite should include an explanation of the steps we have taken, are taking, and plan to take. Try to repeat your sound bite as many times as possible during the interview. Stick it into the interview as many times as you can. Repeat it again and again.

Use the "bridging" technique to tack your sound bite on to answers you give to other questions; i.e., after you give a short answer to the a reporter's question, insert a "bridge" and cross over the bridge to your sound bite. For example:

Question: "Do you know what caused the fire?"

Answer: "No, not at this time. But we do know that it is in the Mixer Building, and we'll be investigating it as soon as we know everyone is safe and the fire is extinguished.

Bridge: "In the meantime, our emergency response is in full swing.

Sound Bite: "We've implemented our Incident Command System. Our Emergency Response Vehicle and the Belle Chasse Volunteer Fire Department are at the scene and working to get control of the situation. We aren't aware of any danger to people or property outside of our fence."

Attachment 3 (Continued)

4.0 Answer Questions

Stick to the facts.

When the TV cameras roll, be positive. Answer the reporter's questions if you can, and then take every opportunity to bridge to your sound-bite message. You will sound repetitious, but remember that the reporters will probably only use one of your sound bites in their stories, so each of your answers should contain your sound-bite message.

DOs

- **State the most important facts first:** What, Where, When, Why, and How. Talk directly and concisely. Back up statements with facts.
- **Listen** closely to what the reporter is asking -- and to what the reporter is not asking.
- **Be responsive, but maintain control** at all times -- of yourself and your bridging to key points in the interview.
- If you can't release information at the time of the interview, explain **why**. Say **when** you may be able to do so.
- Be **honest, responsive,** and **factual**.
- Before beginning your answer, be sure to **correct any false premises or incorrect assumptions** made by the reporter.
- **Know Chevron Oronite's position** and work it into the discussion. **Be positive.**
- Say that **Chevron Oronite knows that the public is concerned** -- if it's appropriate to the subject of the interview.
- **If you are "set up,"** i.e., if you are asked for an interview to discuss one thing and the reporter asks about something else, simply wait until the reporter has finished asking the question. Then say, "I thought this interview was to be about . . . ." You can then say you are not in a position to discuss the newly raised subject. Do not get indignant or angry; you are being recorded. Maintain control of yourself. Do not let yourself be pressured into doing an interview without being prepared.
- **Short answers** are better than long ones. They are easier to understand and more likely to be used unedited in the story.
- **Keep It Simple.** Avoid technical explanations. Remember that you are talking to people who do not share your knowledge of the chemical industry.
- **Look at the interviewer**, not at the TV camera.
- **Keep cool.** *Do not allow yourself to be provoked. Try to remain* **calm** *even under hostile* questioning. Without control, your listening capabilities will be impaired.
- **Assume** that **TV cameras and microphones** are **always on**, recording your words, actions, and expressions. Never ask or agree to go off the record!
- **Remember that your face tells a story** of its own. Make sure that your facial expressions match your verbal story.

Attachment 3 (Continued)

- If there are any **skeletons in the Chevron Oronite closet**, be prepared to have them rattled during the interview. You, of course, will NOT trot them out of the closet and introduce them to the media, but reporters may ask about them anyway. The media may have found out about the skeletons from other sources. So be prepared to deal with them in a positive way, if necessary. Then **bridge to our positive actions/objectives.**

- **Be serious.** Do NOT try to be funny. Your responsibility as Oak Point Spokesperson is NOT to entertain either the media or the listening public.

DON'Ts

- **Don't speculate or offer opinions and conclusions.** Especially avoid those terms that may have legal connotations (e.g., "criminal," "negligent," "liability," "fault," etc.) Stick to factual matters as much as possible.

- **Don't try to bluff. If you don't know something, say so.** The reporter will respect you more if you do not waste time trying to dance around an issue. Simply say, "I don't know, but I will find out and get back to you." **Then make sure you do** (keeping media deadlines in mind)!

- **Don't talk too much.** If you try to be talkative, you will probably say more than you want to say. It is not your responsibility to keep the interview going. Answer the question concisely, bridge to your key points, then shut up.

- **Don't** use industry jargon or acronyms.

- **Don't debate reporters.** You cannot win; you can only lose. Reporters control what the Public will see and hear. It's their game. They're the referee; and it's their ball, their ballpark, and their goalpost. They cannot lose; you can lose and will. **Never debate.**

- **Don't overlap the reporter's question.** Wait for the reporter to finish the question before you begin your answer.

- **Don't say, "No comment."** The reporter will think that you are trying to hide something. If you cannot discuss something because it involves matters of a confidential or proprietary nature, say so. **Never say, "No comment."**

- **Don't** lie.

- **Don't** speculate about causes, consequences, or liabilities.

- **Don't** speculate about when, or whether, the site will be restored to its pre-emergency state.

- **Don't** give out the names of injured Chevron Oronite employees until their families have been notified.

- **Don't** give out information about non-Chevron Oronite casualties. Instead, give out the names of their employers so that the reporters can get that information directly from the non-Chevron Oronite employers.

- **Don't** cast property and environmental damage in terms of money.

- **Don't** estimate the cost of the damage, cleanup, or containment.

Revisions are shown by R and { Text. }

Attachment 3 (Continued)

- **Don't** make statements about the effectiveness of governmental response.
- **Don't** place blame on any employee, equipment, or contractor.
- **Don't** reveal proprietary information (i.e., information owned by ChevronTexaco: trade secrets, etc.).
- **Don't** talk "off the record." Assume that anything you say will be either printed or broadcast.
- **Don't** give an exclusive story to any one reporter. Give the same information to all.
- **Don't** permit rumors and incorrect information to go unchallenged.
- **Don't** be pressured into an instant interview. You have the right to ask for a few minutes to gather information and to organize your thoughts.

Attachment 4

"Media" Trained Personnel

The following personnel have taken the ChevronTexaco Crises Communication course (Media training):

Trained Personnel	Date Last Trained
Colletti, Jason	11/2003
Cyprian, Oliver	11/2003
Diaz, Tristian	11/2003
Hill, Lawrence	11/2003
Landry, Joseph	11/2003
Mahoney, William	11/2003
Maise, Glenn	11/2003
Simpson, Pamela	11/2003
Taylor, Phillip	11/2003
Buccola, Dave	7/1997
Gaubert, Troy	7/1997
Sanders, B. J.	7/1997
Ward, Gary	7/1997
Gurtner, Gregg	8/1996
Koetter, Kevin	8/1996
Leopold, Mark	8/1996
Long, Nick	8/1996
Melancon, Lonnie	8/1996
Hill, Craig	5/1994
Burns, Randy	3/1993
Roussel, Arthur	1/1992
Despaux, Jr., Al	3/1991
Fury, Blaine	7/1989
Tague, Don	7/1989

Chevron ORONITE Oak Point Plant	Oak Point Emergency Response Manual Management Reporting	ERM-6.16 Rev: 1.06 Application Date: 07/30/04 QAR Document Code: N/A Page 1 of 3

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APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
SAFETY SPECIALIST	HEALTH & SAFETY SUPERVISOR	AMERICAS REGION MANAGER
S. J. STUNTZ	G. A. CREEKMORE	M. H. BURNSIDE

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Revisions are shown by R and { Text. }

Uncontrolled Document

1.0 Introduction/Scope

This document tells how to report emergency incidents to Chevron Oronite Company LLC management.

This document covers the correct procedures for reporting emergency incidents that take place at the Oak Point Plant.

2.0 Procedure

2.1 Oak Point Management

The Manager-on-Call or the Americas Region Manager shall report all Category Two and Category Three emergencies (fires/explosions/releases) to the following Chevron Oronite Company LLC personnel. In addition, the Oronite Americas Manager shall be informed within 24 hours of any OSHA Recordable injuries to Chevron Oronite personnel or "Reportable Quantity" environmental releases.

William (Bill) Schumacher, V.P. Manufacturing & Supply
Work: (925) 842-0032

2.2 Oronite Management

The Oronite Americas Regional Manager will arrange for verbal notification of the following Chevron Oronite Company LLC personnel:

R. C. (Ron) Kiskis, President
Work: (925) 842-3232

3.0 Definitions

Category Two Emergency - Incidents that: (1) adversely affect life or property outside of the Oak Point Plant; and/or (2) require the call out of additional resources. Refer to ERM-6.1, Incident Command System, "Category Two Emergency" for a more detailed definition.

Category Three Emergency - Major emergency or disaster requiring a lengthy or extensive response. Refer to ERM-6.1 Incident Command System, ("Category Three Emergency" for a more detailed definition.

4.0 References

Chevron Oronite Company Off-Site Emergency Response Preparedness Manual (7/92)

5.0 Records

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Page	Revision	Date	Comments
1-6(0)	1.00	07/1993	Creation of the procedure
1-6(0)	1.01	12/1993	Miscellaneous revisions
1-6(0)	1.02	05/1994	Revised CCC contact list
1-6(0)	1.02	06/1995	Miscellaneous revisions
1-6(0)	1.04	12/1995	Revised Section 4.1 and 4.2 including management personnel and telephone numbers
1-6(1)	1.05	01/1999	Addition of Attachment A, Oronite Incident Communications Form
1-3(1)	1.06	07/30/2004	Review of ERM, update of names and signatures, application of new format.

(#) = Number of attachment pages

6.0 Attachments

Attachment 1 – Oronite Incident Communications Form

Revisions are shown by **R** and { Text. }

Attachment 1

Oronite Incident Communications Form

Date:

Time:
Author:

Use this form for rapid communications of incidents such as:

Fires Releases
Injuries Spills
Major hardware problems/shutdowns

This form does not substitute for GO-42. A formal incident report must follow. Keep simple, do not state speculations as fact, if information is sketchy, record that fact in the text. Do not draw conclusions as to the root cause until a formal investigation has been performed.

Brief description of incident

Business impact

Date and time of incident

Action being taken to respond

Media or agency attention/involvement

Key contact person (who to contact for details) Name and phone number

Email to:
All OLT members

Chevron ORONITE Oak Point Plant	Oak Point Emergency Response Manual Post Emergency Response Operations Procedures	ERM-7.0 Rev: 1.02 Application Date: 07/30/04 QAR Document Code: N/A Page 1 of 8

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APPROVAL

ORIGINATED	REVIEWED	AUTHORIZED
SAFETY SPECIALIST	HEALTH & SAFETY SUPERVISOR	AMERICAS REGION MANAGER
S. J. STUNTZ	G. A. CREEKMORE	M. H. BURNSIDE

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1.0 Introduction/Scope

Post-emergency operations begin when the emergency response has been completed. These operations aim to do two things:

- To lessen any undesirable effects of the incident and the emergency response
- To make sure that emergency responders learn all they can from their participation in the emergency response

This section covers two major post-emergency response operations procedures: 1) Clean up and Critique; and 2) Community Awareness and Emergency Response

CLEAN-UP AND CRITIQUE PROCEDURE

The clean-up and critique procedure will provide guidelines for two different processes:

- Cleanup operations that (a) follow the emergency response and (b) are covered by HAZWOPER regulations.
- Critique of the emergency response effort so that emergency responders can (a) learn valuable lessons from their participation in a recently concluded emergency response and (b) improve their performances in future emergency responses.

COMMUNITY AWARENESS AND EMERGENCY RESPONSE PROCEDURE (CAER)

This Community Awareness and Emergency Response Procedure provides written guidelines and considerations for meeting the needs of the community surrounding Oak Point should they be directly impacted by an emergency at Oak Point or any other emergency, such as a hurricane or major transport incident.

Assisting the community in recovery needs after an emergency or evacuation will help Chevron maintain or improve its positive image in the community. In addition, the CAER Code of Responsible Care requires that plans be made for Community Recovery needs during and after an emergency.

Community assistance or community recovery will probably be required only in the event of a natural disaster, such as a hurricane, a major transport incident that affects the total community, or a major category three (3) emergency most likely will have impact beyond the plant perimeter and is further defined in the Emergency Response Manual (ERM) Document 6.1. ERM Documents 6.6 and 6.12 give additional guidance related to transport incidents and storm threats, respectively.

An emergency or crisis of this magnitude usually will be handled out of the Emergency Operations Center (EOC) located in the small conference room next to the Americas Region Manager's office in the Administration building. See ERM Document 6.1 for EOC related information.

Handling community concerns and meeting the needs of the community will be a high priority for the EOC.

All emergency responders should familiarize themselves with the information in this document.

2.0 Post Emergency Operations Procedures

Post-emergency operations include cleanup and termination activities. Proper training is an essential part of all cleanup activities. Termination activities include a debriefing and a critique. These activities are outlined in 29 CFR 1910.120 q(6)iii(H).

Post-emergency response operations cannot begin until the IC declares the site to be under control and ready to begin cleanup operations. This means that the HazMat Team and HAZWOPER Levels II and III O&M personnel have already responded to a spill of a hazardous liquid, release of a hazardous gas or vapor, or a fire. In addition, hazardous liquids must be contained, diluted, or neutralized and made as harmless as possible. Vapors must be below the TLV/PEL, and fires must be under control. All these activities need to be completed before the IC will declare the site to be under control and allow cleanup personnel to respond.

2.1 Training/Cleanup Activities

2.1.1 Proper training is one of the main considerations prior to starting a cleanup operation.

Any person that will be used for cleanup activities must satisfy the training requirements outlined in OSHA 29 CFR 1910.120 (q)11.

2.1.2 Paragraph (q) 11 requires that the employer conducting the post-emergency cleanup comply with one of the two alternative requirements listed below:

- Meet all of the requirements of paragraphs (b)-(o) of the above regulation – including the 40-hour initial training requirement.
- Complete the training requirements of the following:
  - 29 CFR 1910.38 - Emergency Action Plans - the Oak Point Emergency Response Manual provides the emergency plans, and the regular HAZWOPER training fulfills this training requirement.
  - 29 CFR 1910.134 – The Respirator Regulation – for further information see Oak Point PI-721.
  - 29 CFR 1910.1200 – The Hazard Communication Regulation – for further information see Oak Point PI-724.
  - Other safety and health training as outlined in Document ERM-5.0, Emergency Response Training.

2.1.3 The 40-hour training requirement outlined in HAZWOPER 29 CFR 1910.120 (b)-(o) is only required for those workers who are unfamiliar with the chemicals and associated environmental hazards. So this requirement applies to off-site personnel such as a cleanup contractor.

2.1.4 At Oak Point, Contractors routinely stationed on-site may do on-site cleanup work. The Contract Services/Labor Group is trained in safely handling the hazardous chemicals at Oak Point. Oak Point employees that have had Level II and III HAZWOPER training may also do cleanup work on-site. See ERM-5.0, Emergency Response Training for the list of employees trained to Level II and III.

The above group of workers will be the most likely group to do cleanup for Oak Point. The 40-hour training requirement is not applicable to this group of workers.

If an off-site contractor, unfamiliar with the Oak Point Plant, is brought on-site to perform cleanup activities, the alternate outlined in Section 2.1, requiring 40 hours of training, will apply. The off-site contractor shall provide this training requirement.

2.1.5 Contractors – other than Contract Services/Labor Group – requested by Chevron Oronite to do cleanup of Hazardous waste for any off-site incident must be qualified under HAZWOPER 29 CFR 1910.120 q(11) which includes sections (b)-(o) of the regulation and 40 hours of training for all employees. Contractor qualifications need to be confirmed as a general practice.

2.1.6 If Chevron Oronite or Contract Services/Labor Group personnel are requested to go off-site for cleanup activities, they will only be allowed to handle Chevron Oronite (Oak Point) products including toll-processed materials. See ERM-6.6, Oronite Additives Division Off-Site Emergencies for additional details. In this case, the 40-hour training requirement does not apply.

2.1.7 As a general rule, all equipment to be used in the performance of the cleanup work shall be in serviceable condition and shall have been inspected prior to use.

2.2 Termination Activities

2.2.1 Hazwoper (29 OSHA 1910.120)

This regulation uses the word "termination" to mean the combination of a debriefing and the critique. Termination activities involve documenting safety procedures, site operations, hazards faced, and lessons learned from the incident. HAZWOPER states that after each incident (use of the ICS for Category 1, 2, or 3 emergency response), a debriefing and critique should be conducted. See ERM-6.1, Incident Command System, for definitions of Category 1, 2, and 3 incidents. Debriefing distributes the right amount of information to the right persons before they leave the incident scene. The critique focuses on improving efficiency and pinpointing weaknesses associated with the emergency response.

2.2.2 The Debriefing Procedure

- Should be conducted as soon as the emergency phase of the incident ends.
- Should include the response team, ICS officers, and other key players in the emergency response.
- Should be coordinated by the IC.
- Should include the following topics:
  - Health information related to chemical exposure by response personal
  - Equipment damage and unsafe conditions
  - Problems requiring immediate attention
  - Assignment of a follow-up contact person from the incident to help with data gathering for the critique

2.2.3 The Critique Procedure

- Should be conducted as soon as practical after the incident.
- Should include the following personnel:
  - ICS Officers
  - Management/Staff, as appropriate
  - Representatives from the outside agencies and other key emergency response personnel

2.2.4 Agenda

- Agenda topics related to the critique of the incident shall include the following as a minimum:
  - What caused the emergency/incident.
  - What can be done to prevent it in the future.
- Agenda topics related to the emergency response should include as a minimum:
  - What was done right.
  - What was done wrong.
  - What could have been done differently.
- The critique should be used as a valuable learning experience for all -- not as a mechanism to assign blame.

2.3 Community Awareness and Emergency Response (CAER)

Listed below are the key community emergency or crisis management concerns in the event of a natural disaster, a major transport incident or a major Category Three (3) emergency with off-site or community impact.

2.3.1 Community Emergency Concerns during the Emergency

Provide an immediate, positive response to the community during a major Oak Point emergency. A good communications response can never cover for a bad operational response. Conversely, a good clean-up effort may be overlooked or ignored without an effective communications response effort.

During an Oak Point emergency, quickly take charge of the flow of news and provide a credible, concerned and wholly committed spokesperson. See ERM-6.15, Media Relations for more information on this subject. Key areas to consider include:

- Helpline(s) activated as soon as possible.
- Plans made for additional phones for Helpline calls during emergency.
- A recorder installed on a phone with hourly updates to advise callers about what is happening, when next update will be, etc. Give number to helpline callers or whatever way is appropriate to get this telephone number out to the public.

Attend promptly to Chevron Oronite and Corporate communications.

- See ERM- 6.16, Management Reporting.

Understand the audiences with whom you need to communicate.

- Media
- Local authorities
- Community
- Government authorities (all levels)
- Customers
- Technical experts
- Regulatory agencies

Provide someone who can get cash or handle financial needs related to the community. This is usually the Accounting Manager or delegate (Finance Officer per EOC Chart). The Stores Supervisor or delegate (Procurement Officer per EOC chart) may be requested to help on purchase orders, local accounts, etc.

Provide someone to handle approval of financial disbursements or other direct assistance to the community. This will usually be the Americas Region Manager, Manager-on-Call or delegate. The Americas Region Manager or Manager-on-Call will use his or her discretion to commit use of funds or Company resources as warranted by the emergency.

Integrate local Oak Point operations with government agency communications at every level:

- Contact Sheriff Office, ambulance, fire department, government and regulatory agencies as needed. See Emergency Response Manual telephone list and ERM-6.6, 6.10 and 6.16.

Set up a media room as close as possible to Emergency Operations Center (EOC) to ensure up to the minute, factual information for media since media is considered to be the initial conduit to the outside world. Public Affairs should work with each group of reporters to answer questions and direct them to Chevron Oronite representatives who can provide answers.

- Make Senior management available to media for reassurance, accuracy, and positive image. Do not get tied to a desk in the Emergency Operations Center. Be part of the team, know what's going on, and share information. Accurate, objective reporting early on by the media can provide much needed information to the community and can minimize misinformation or rumors.

- Work very closely with Parish officials, response teams, State police and Sheriff's Office every step of the way to make sure all knowledge was given to them to give to the community.

In the event of evacuation of nearby residents, take care of the following additional community needs:

- Immediately:
  Notify local motels to receive evacuees and give them a Purchase Order (PO) number so they can charge rooms to Chevron Oronite make check-in as easy as possible.

- As soon as possible:
  Provide for food for evacuees.

  Set up open accounts with local pharmacies and other essential services for evacuees.

  Contact local lumber companies and hardware stores as soon as immediate threat is over with a PO number for an open account and directions to give persons with property damage supplies to prevent further damage (ex: boards, etc. to go over broken windows, etc.).

  Reassure employees (within a few hours of the incident) that plant will be rebuilt and jobs are secure in order to help their morale.

  Cooperate fully with OSHA, EPA, LDEQ, Coast Guard, and any other agencies. Each will immediately come to the site to investigate, monitor, and provide guidance on cleanup of hazardous material. Someone, usually the Environmental Supervisor or delegate will be assigned to coordinate the inspection or investigation by any governmental agency.

2.4 Community Emergency Concerns after the Emergency

2.4.1 As soon as the emergency is under control and it is physically possible:

- Organize teams of employees and craftsmen to go into the community to render any assistance possible to the townspeople affected, such as:

  - Carpentering
  - Making repairs
  - Transporting goods and supplies for those who need help
  - Plumbing

Note:	Paying particular attention to the disabled and elderly, since they can't do the work themselves

2.4.2 It is very important for Company to be simultaneously rebuilding, cleaning up, etc., both inside and outside of the Plant. This will help maintain our working relationship with the community. Some additional ideas are outlined below:

- If necessary, bring insurance adjusters in immediately and establish a claims contact at Oak Point. To further speed repairs, temporarily waive insurance release procedures so townspeople can get money on the spot and people can get back in their homes as soon as possible.

- Meet with citizens for a town hall meeting after one (1) week. Request Parish Council to chair the meeting. The meeting may get emotional at times, but it will defuse tensions. At the meeting reassure continued operations and commitment to the community.

2.4.3 Finally, don't go it alone. Make use of the expertise of consultants and even competitors. Usually a crisis affecting one company affects an entire industry.

3.0 Definitions

CFR	=	Code of Federal Regulations
ERM	=	Oak Point Emergency Response Manual
HazMat	=	Hazardous materials
HAZWOPER	=	Hazardous Waste Operations and Emergency Response (OSHA regulations)
IC	=	Incident Commander of the ICS
ICS	=	The Oak Point Incident Command System
O&M	=	Operations & Maintenance
OSHA	=	Occupational Safety & Health Administration
PEL	=	Permissible Exposure Limit
TLV	=	Threshold Limit Value

4.0 References

None.

5.0 Records

Obsolete copies of this procedure shall be archived in the OPDMS in accordance with Corporate retention guidelines. Requests for review copies of documents in Archive Status shall be made in accordance with PI-113.

Record of Revisions and Reviews

Page	Revision	Date	Comments
1-5(0)	1.00	12/1993	Creation of the procedure
1-12(0)	1.01	01/1999	Complete revision
1-8(0)	1.02	07/30/2004	ERM review, update of names and signatures, *application of new format*

(#) = Number of attachment pages

6.0 Attachments

None

Chevron

Oronite

Troy Sampey
Environmental Specialist

Oak Point Plant
Chevron Oronite Co. LLC
P. O. Box 70
10285 Highway 23
Belle Chasse, LA 70037
Tel 504-391-6101
Fax 504-391-6356

May 24, 2007

Ochsner Westbank
Mr. Mike OBryan
2500 Belle Chasse Highway
Gretna, LA 70056

RE: Chevron Oronite Company, LLC
Oak Point Plant
Belle Chasse, LA 70037
Agency Interest Number: 1708

Dear Mr. OBryan:

Chevron Oronite Company, LLC (Chevron), is submitting a permit renewal application to the Louisiana Department of Environmental Quality for the continued operation of their non-hazardous solid waste facility located near Belle Chasse in Plaquemines Parish, Louisiana.

In accordance with Louisiana R.S. 30:2157, the applicant must obtain certification from the local hospital as to whether or not they are able to accept and treat patients who are contaminated with hazardous materials.

We respectfully request a letter of confirmation regarding the ability of your hospital to provide these services in the event of an emergency that cannot be handled by Chevron's personnel.

If there are questions concerning this information, please contact me at (504) 391-6314 or email tsampey@chevron.com.

Sincerely,

Troy Sampey

Ochsner™
Medical Center – West Bank

June 1, 2007

ATTN: Troy Sampey
Chevron Oronite Co., LLC
10285 Hwy 23
Belle Chasse, LA 70037
Agency Interest #: 1708

Dear Mr. Sampey,

We are in receipt of your letter requesting capabilities of our facility for treatment of patients with hazardous material contamination.

Please let this letter serve as confirmation that we, at Ochsner Westbank, are prepared and able to accept patients contaminated with hazardous materials for treatment.

Should you need any further information or have any questions, please call our office at (504) 391-5128.

Sincerely,

E. Mike O'Bryan, MD
CEO
Ochsner Medical Center-Westbank

Chevron

Oronite

Troy Sampey
Environmental Specialist

Oak Point Plant
Chevron Oronite Co. LLC
P. O. Box 70
10285 Highway 23
Belle Chasse, LA 70037
Tel 504-391-6101
Fax 504-391-6356

May 24, 2007

Plaquemines Parish Ambulance Department
Ms. Gina Meyer
3706 Main St., Lot A
Belle Chasse, LA 70037

RE: Chevron Oronite Company, LLC
Oak Point Plant
Belle Chasse, LA 70037
Agency Interest Number: 1708

Dear Ms. Meyer:

Chevron Oronite Company, LLC (Chevron), is submitting a permit renewal application to the Louisiana Department of Environmental Quality for the continued operation of their non-hazardous solid waste facility located south of Belle Chasse in Plaquemines Parish, Louisiana.

In accordance with Louisiana R.S. 30:2157, the applicant must obtain certification from the local emergency medical services agency as to whether or not that agency has the ability to meet the response requirements of Section 473 of the Life Safety Code of the National Fire Protection Association. We respectfully request a letter of confirmation regarding the ability of your agency to provide these services in the event of an emergency that cannot be handled by Chevron's emergency medical personnel.

If there are questions concerning this information, please contact me at (504) 391-6314 or email tsampey@chevron.com.

Sincerely,

Troy Sampey

Plaquemines Parish Government

AMBULANCE DEPARTMENT
3706 Main Street
Lot A
Belle Chasse, LA 70037

June 7, 2007

Chevron Ornite Company, LLC
Troy Sampey, Environmental Specialist
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037

Dear Mr. Sampey,

Plaquemines Parish Government, Ambulance Department provides emergency medical services response and is the primary 911 responding ambulance service to your above listed facility. All emergency calls are to be routed through the parish 911 system. These services are provided on an as requested/available basis. If a Plaquemines Parish Government ambulance is not able to respond the call will be routed to an available private service.

Responses by the Ambulance Department, involving hazardous materials will be handled in conjunction with the Belle Chasse Volunteer Fire Department. The fire department will be the lead agency responsible on all hazardous material scenes.

If there are any questions concerning this, please contact me at (504) 394-2761 and please note my cell phone number for emergencies is (504) 912-5285.

Sincerely,

Gina Meyer
Superintendent

Administration (504) 394-2761
Fax (504) 394-5271
Billing (504) 394-0214
Education (504) 394-4887

Appendix I

Copy of Louisiana Pollutant
Discharge Elimination System
Permit

State of Louisiana

Department of Environmental Quality

KATHLEEN BABINEAUX BLANCO
GOVERNOR

AUG 17 2004

MIKE D. McDANIEL, Ph.D.
SECRETARY

CERTIFIED MAIL 7004 0750 0003 9163 9332 **-RETURN RECEIPT REQUEST**

EPA CERTIFIED 7004 0750 0003 9163 9349

File No.: LA0005738
AI No.: 1708
Activity No.: PER20030007

Mr Troy Sampey, Environmental Specialist
Chevron Oronite Company, LLC
Oak Point Plant
10285 Highway 23 South
Belle Chasse, LA 70037-0070

RE: Louisiana Pollutant Discharge Elimination System (LPDES) permit to discharge process wastewater and process area stormwater, once-through noncontact cooling water, boiler blowdown, clarifier underflow, underflow filter backwash, softener blowdown, and non-process area stormwater runoff to the Mississippi River from an existing industrial organic chemicals manufacturer located at 10285 Highway 23 South, Belle Chasse, Plaquemines Parish.

Dear Mr Sampey:

This Office has received and evaluated comments submitted by Chevron Oronite Company, LLC in response to the public notice published in the Office of Environmental Services Public Notice Mailing List on June 15, 2004, and the PLAQUEMINES GAZETTE of Belle Chasse on June 19, 2004. The Office's response to comments submitted by Chevron Oronite Company, LLC are summarized below. No comments have been received from the general public.

Comment No. 1: The proposed LPDES permit states that compliance samples be taken at "...north of Tank 5224 and east of I Street...". Chevron respectfully requests that this description be revised to "...near the intersection of K Street and 5th Street..." to more accurately represent the location of the monitoring point.

Response to Comment No. 1: The Office of Environmental Services concurs with the permittee's request and the appropriate corrections have been made.

Comment No. 2: The proposed LPDES permit requires that Outfall 102 be monitored for phenol (0.1 mg/L daily maximum effluent limitation) once per month utilizing a grab sample to evaluate the once-through cooling water for breakthrough from the cooling system tubing. As part of improvements to the Outfall 202/002 effluent piping, Chevron intends on changing the primary routing of Outfall 102 to Outfall 001. Therefore it would probably be appropriate for the phenol monitoring requirements to be also assigned to Outfall 001 if it is receiving flow from Outfall 102.

Response to Comment No. 2: The Office of Environmental Services concurs with the permittee's request and the appropriate corrections have been made.

Comment No. 3: The proposed LPDES permit states that compliance samples be taken "..prior to combining with the waters of the Mississippi River." This outfall is monitored at Internal Outfalls 102 and 202 as a 24-hour flow-weighted composite for the purpose of biomonitoring, utilizing one grab collected from each internal outfall every six hours and proportioned together by flow in the laboratory. The proposed LPDES permit also requires new monitoring for ammonia and phosphorus, utilizing grab samples. Chevron respectfully requests that the description be revised to reflect the compliance monitoring locations as being the combination of the internal outfalls. Chevron also requests that the nutrient monitoring be performed on 24-hour composite samples to minimize the effects of variability in the daily discharge so that the state obtains a more accurate representation of the ammonia and phosphorus in the effluent discharge.

Response to Comment No. 3: The Office of Environmental Service concurs with the permittee's request of correcting the language for the description of the compliance monitoring location for Outfall 002. The ammonia and phosphorus reporting requirements have been moved to Internal Outfall 202 to reflect the discharges from the process. The sample type will remain grab.

Comment No. 4: The proposed LPDES permit did not include a STORET code for the monitoring/reporting of oil & grease. Please confirm that 03582 is the STORET code that is to be reported on the discharge monitoring report.

Response to Comment No. 4: The Office of Environmental Services concurs with the permittee's comment and the appropriate corrections have been made.

Pursuant to the Clean Water Act (33 U.S.C. 1251 et seq.), and the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached LPDES permit has been issued. Provisions of this permit may be appealed in writing pursuant to La. R.S. 2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing unless the secretary or the assistant secretary elects to suspend other provision(s) as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

This permit shall replace the previously effective State (LPDES) permit. All future correspondence regarding this permit shall use the Agency Interest (AI) number 1708 and LPDES permit number LA0005738.

Monitoring results should be reported on a Discharge Monitoring Report (DMR) form per the schedule specified. A copy of the form to be used is attached for your convenience. Copies to be submitted to the regional office should be sent to the Southeast Regional Office, Office of Environmental Compliance, 201 Evans Road, Bldg. 4, Suite 420, New Orleans, Louisiana 70123-5230.

Should you have any questions concerning any part of the permit, please feel free to contact Heather Babin of the Office of Environmental Services at the address on the preceding page or telephone (225) 219-3138.

Sincerely,

Karen K. Gautreaux
Deputy Secretary

hb

Attachments

c: cover letter and permit:

Ms. Evelyn Rosborough (6WQ-CA)
U. S. Environmental Protection
Agency, Region VI (by Certified Mail)

Permit Compliance Unit
Office of Environmental Compliance

Heather Babin
Permits Division

IO-W File

PERMIT NUMBER
LA0005738
AI No.: 1708

OFFICE OF ENVIRONMENTAL SERVICES

Water Discharge Permit

Pursuant to the Clean Water Act, as amended (33 U.S.C. 1251 et seq.), and the Louisiana Environmental Quality Act, as amended (La. R. S. 30:2001 et seq.), rules and regulations effective or promulgated under the authority of said Acts, and in reliance on statements and representations heretofore made in the application, a Louisiana Pollutant Discharge Elimination System permit is issued authorizing

Chevron Oronite Company, LLC
Oak Point Plant
10285 Highway 23 South
Belle Chasse, LA 70037-0070

Type Facility: industrial organic chemicals manufacturer

Location: 10285 Highway 23 South, Belle Chasse
Plaquemines Parish

Receiving Waters: Mississippi River

to discharge in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, and III attached hereto.

This permit shall become effective on September 1, 2004

This permit and the authorization to discharge shall expire five (5) years from the effective date of the permit.

Issued on August 13, 2004

Karen K. Gautreaux
Deputy Secretary

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 001, the continuous discharge to the Mississippi River of once-through noncontact cooling water, boiler blowdown, and the intermittent discharge of wastewaters from Internal Outfall 101.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations (lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)		Monitoring Requirements	
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow-MGD	50050	Report	Report	---	---	Continuous	Recorder
TOC (net) (*1)	00680	---	---	---	5	1/week	Grab
Phenol (*2)	34694	---	---	---	0.1	1/month	Grab
pH Range Excursions (Continuous Monitoring), Number of Events >60 Minutes	82581	---	0(*3)	---	---	Continuous	Recorder
pH Range Excursions (Continuous Monitoring), Monthly Total Accumulated Time in Minutes	82582	---	446(*3)	---	---	Continuous	Recorder
pH Minimum/Maximum Values (Standard Units)	00400	---	---	Report (Min)	Report (Max)	Continuous	Recorder

WHOLE EFFLUENT (ACUTE) TOXICITY TESTING

See Outfall 002.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 001, after the last collection point in the Utilities and Filters Area; near the intersection of K Street and 5th Street, prior to combining with the waters of the Mississippi River.

FOOTNOTE(S):

(*1) The daily TOC concentration of the once-through cooling water system effluent less the daily TOC concentration of the once-through cooling water system intake shall not exceed 5 mg/L. Concurrent sampling of cooling water system intake effluent is required.

(*2) Required when the discharge from Internal Outfall 102 is routed through Outfall 001.

(*3) The pH shall be within the range of 6.0 - 9.0 standard units at all times subject to the continuous monitoring pH range excursion provisions at Part II.I.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Internal Outfall 101, the intermittent discharge to the Mississippi River of the underflow stream from the raw river water intake clarification system, filter backwash, and softener blowdown.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations (lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)		Monitoring Requirements	
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency (*1)	Sample Type
Flow-MGD	50050	Report	Report	---	---	1/week	Estimate

COAGULANTS:

The quantity and types of all coagulants (clarifying agents) used in the intake raw river water treatment clarification system during the sampling month shall be recorded. Records of the quantity and type of coagulants used shall be retained for three (3) years following Part III.C.3. No DMR reporting shall be required.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Internal Outfall 101, at the point of discharge of the underflow from the raw river water intake clarifier in the Utilities and Filters Area on the west side of the clarifier unit on 5th Street, prior to combining with the waters of Outfall 001.

FOOTNOTE(S):

(*1) When discharging.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 002, the continuous discharge to the Mississippi River of the effluents from Internal Outfalls 102 and 202.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations				Monitoring Requirements	
		(lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)			
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
WHOLE EFFLUENT (ACUTE)TOXICITY TESTING (*1)				(Percent %, UNLESS STATED)			
	STORET Code			Monthly Avg Minimum	48-Hour Minimum	Measurement Frequency	Sample Type
NOEC, Pass/Fail [0/1], Lethality, Static Renewal, 48-Hour Acute, Pimephales promelas	TEM6C	---	---	Report	Report	1/year	24-hr. Composite
NOEC, Value [%], Lethality, Static Renewal, 48-Hour Acute, Pimephales promelas	TOM6C	---	---	Report	Report	1/year	24-hr. Composite
NOEC, Value [%], Coefficient of Variation, Static Renewal, 48-Hour Acute, Pimephales promelas	TQM6C	---	---	Report	Report	1/year	24-hr. Composite
NOEC, Pass/Fail [0/1], Lethality, Static Renewal, 48-Hour Acute, Daphnia pulex	TEM3D	---	---	Report	Report	1/year	24-hr. Composite
NOEC, Value [%], Lethality, Static Renewal, 48-Hour Acute, Daphnia pulex	TOM3D	---	---	Report	Report	1/year	24-hr. Composite
NOEC, Value [%], Coefficient of Variation, Static Renewal, 48-Hour Acute, Daphnia pulex	TQM3D	---	---	Report	Report	1/year	24-hr. Composite

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 002, the point of discharge prior to combining with the waters of the Mississippi River. See (*1) below.

FOOTNOTE(S):

(*1) Biomonitoring shall be conducted on the flow-weighted composite of the combined discharges of Outfalls 001, 102, and 202 and shall be reported on the DMRs as Outfall 002. See Part II.O.3.d.v. for sampling procedures applicable to multiple outfalls.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Internal Outfall 102, the continuous discharge of once-through noncontact cooling water (alternate routing).

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations (lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)		Monitoring Requirements	
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency(*1)	Sample Type
Flow-MGD	50050	Report	Report	---	---	Continuous	Recorder
TOC (net) (*2)	00680	---	---	---	5	1/week	Grab
Phenol	34694	---	---	---	0.1	1/month	Grab
pH Range Excursions (Continuous Monitoring), Number of Events >60 Minutes	82581	---	0(*3)	---	---	Continuous	Recorder
pH Range Excursions (Continuous Monitoring), Monthly Total Accumulated Time in Minutes	82582	---	446(*3)	---	---	Continuous	Recorder
pH Minimum/Maximum Values (Standard Units)	00400	---	---	Report (Min)	Report (Max)	Continuous	Recorder

WHOLE EFFLUENT (ACUTE) TOXICITY TESTING

See Outfall 002.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Internal Outfall 102, at the point of discharge in the Ecology Area on the north side of the fore- and aftbays on 9th Street, piror to combining with the waters of Internal Outfall 202.

FOOTNOTE(S):

(*1) When discharging.

(*2) The daily TOC concentration of the once-through cooling water system effluent less the daily TOC concentration of the once-through cooling water system intake shall not exceed 5 mg/L. Concurrent sampling of cooling water system intake effluent is required.

(*3) The pH shall be within the range of 6.0 - 9.0 standard units at all times subject to the continuous monitoring pH range excursion provisions at Part II.1.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 202, the continuous discharge of treated process wastewater and process area stormwater, incinerator scrubber blowdown, landfill leachates, hydrostatic test waters, reverse osmosis unit reject water, regeneration streams, boiler blowdown, and non-process area stormwater runoff.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations (lbs/day, UNLESS STATED)		Other Units (ug/L, UNLESS STATED)		Monitoring Requirements	
CONVENTIONAL AND NONCONVENTIONAL	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow-MGD	50050	Report	Report	---	---	Continuous	Recorder
BOD_5	00310	943	2516	---	---	1/week	24-hr. Composite
TSS	00530	1196	3841	---	---	1/week	24-hr. Composite
Oil & Grease	03582	228	455	---	---	1/week	Grab
Ammonia (as N)	00609	Report	Report	---	---	1/year	Grab
Phosphorus	00665	Report	Report	---	---	1/year	Grab
pH Range Excursions (Continuous Monitoring), Number of Events >60 Minutes	82581	---	0(*1)	---	---	Continuous	Recorder
pH Range Excursions (Continuous Monitoring), Monthly Total Accumulated Time in Minutes	82582	---	446(*1)	---	---	Continuous	Recorder
pH Minimum/Maximum Values (Standard Units)	00400	---	---	Report (Min)	Report (Max)	Continuous	Recorder
VOLATILE COMPOUNDS(*2)							
Acrylonitrile	34215	1.86	4.69	---	---	1/year	24-hr. Composite
Benzene	34030	0.72	2.63	---	---	1/year	24-hr. Composite
Carbon Tetrachloride	32102	0.35	0.74	---	---	1/year	24-hr. Composite
Chlorobenzene	34301	0.29	0.54	---	---	1/year	24-hr. Composite
Chloroethane	34311	2.01	5.19	---	---	1/year	24-hr. Composite
Chloroform	32106	0.41	0.89	---	---	1/year	24-hr. Composite
1,1-Dichloroethane	34496	0.43	1.14	---	---	1/year	24-hr. Composite
1,2-Dichloroethane	34531	1.32	4.09	---	---	1/year	24-hr. Composite
1,1-Dichloroethylene	34501	0.31	0.48	---	---	1/year	24-hr. Composite
1,2-trans-Dichloroethylene	34546	0.41	1.05	---	---	1/year	24-hr. Composite
1,2-Dichloropropane	34541	2.96	4.45	---	---	1/year	24-hr. Composite
1,3-Dichloropropylene	51044	0.56	0.85	---	---	1/year	24-hr. Composite
Ethylbenzene	34371	0.62	2.09	---	---	1/year	24-hr. Composite
Methyl Chloride	34418	1.67	3.68	---	---	1/year	24-hr. Composite
Methylene Chloride	34423	0.77	1.72	---	---	1/year	24-hr. Composite
Tetrachloroethylene	34475	0.43	1.08	---	---	1/year	24-hr. Composite
Toluene	34010	0.50	1.55	---	---	1/year	24-hr. Composite

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (Outfall 202 continued)

Effluent Characteristic		Discharge Limitations (lbs/day, UNLESS STATED)		Other Units (ug/L, UNLESS STATED)		Monitoring Requirements	
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
1,1,1-Trichloroethane	34506	0.41	1.05	---	---	1/year	24-hr. Composite
1,1,2-Trichloroethane	34511	0.41	1.05	---	---	1/year	24-hr. Composite
Trichloroethylene	39180	0.41	1.05	---	---	1/year	24-hr. Composite
Vinyl Chloride	39175	2.01	5.19	---	---	1/year	24-hr. Composite
ACID COMPOUNDS(*2)							
2-Chlorophenol	34586	0.60	1.90	---	---	1/year	24-hr. Composite
2,4-Dichlorophenol	34601	0.76	2.17	---	---	1/year	24-hr. Composite
2,4-Dimethylphenol	34606	0.35	0.70	---	---	1/year	24-hr. Composite
4,6-Dinitro-o-Cresol	34657	1.51	5.36	---	---	1/year	24-hr. Composite
2,4-Dinitrophenol	34616	1.37	2.38	---	---	1/year	24-hr. Composite
2-Nitrophenol	34591	0.79	1.34	---	---	1/year	24-hr. Composite
4-Nitrophenol	34646	1.39	2.40	---	---	1/year	24-hr. Composite
Phenol	34694	0.29	0.50	---	---	1/month	24-hr. Composite
BASE NEUTRAL COMPOUNDS(*2)							
Acenaphthene	34205	0.43	1.14	---	---	1/year	24-hr. Composite
Acenaphthylene	34200	0.43	1.14	---	---	1/year	24-hr. Composite
Anthracene	34220	0.43	1.14	---	---	1/year	24-hr. Composite
Benzo(a)anthracene	34526	0.43	1.14	---	---	1/year	24-hr. Composite
Benzo(a)pyrene	34247	0.45	1.18	---	---	1/year	24-hr. Composite
3,4-Benzofluoranthene	34230	0.45	1.18	---	---	1/year	24-hr. Composite
Benzo(k)fluoranthene	34242	0.43	1.14	---	---	1/year	24-hr. Composite
Bis(2-ethylhexyl)phthalate	39100	1.99	5.40	---	---	1/year	24-hr. Composite
Chrysene	34320	0.43	1.14	---	---	1/year	24-hr. Composite
1,2-Dichlorobenzene	34536	1.49	3.16	---	---	1/year	24-hr. Composite
1,3-Dichlorobenzene	34566	0.60	0.85	---	---	1/year	24-hr. Composite
1,4-Dichlorobenzene	34571	0.29	0.54	---	---	1/year	24-hr. Composite
Diethyl phthalate	34336	1.57	3.93	---	---	1/year	24-hr. Composite
Dimethyl phthalate	34341	0.37	0.91	---	---	1/year	24-hr. Composite
Di-n-butyl phthalate	39110	0.52	1.10	---	---	1/year	24-hr. Composite
2,4-Dinitrotoluene	34611	2.19	5.52	---	---	1/year	24-hr. Composite
2,6-Dinitrotoluene	34626	4.94	12.41	---	---	1/year	24-hr. Composite
Fluoranthene	34376	0.48	1.32	---	---	1/year	24-hr. Composite
Fluorene	34381	0.43	1.14	---	---	1/year	24-hr. Composite
Hexachlorobenzene	39700	0.29	0.54	---	---	1/year	24-hr. Composite
Hexachlorobutadiene	34391	0.39	0.95	---	---	1/year	24-hr. Composite
Hexachloroethane	34396	0.41	1.05	---	---	1/year	24-hr. Composite
Naphthalene	34696	0.43	1.14	---	---	1/year	24-hr. Composite
Nitrobenzene	34447	0.52	1.32	---	---	1/year	24-hr. Composite
Phenanthrene	34461	0.43	1.14	---	---	1/year	24-hr. Composite
Pyrene	34469	0.48	1.30	---	---	1/year	24-hr. Composite
1,2,4-Trichlorobenzene	34551	1.32	2.71	---	---	1/year	24-hr. Composite

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (Outfall 202 continued)

WHOLE EFFLUENT (ACUTE) TOXICITY TESTING

See Outfall 002.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 202, after mixing of the wastewaters from the polishing filters and the induced air flotation units (in the Ecology Area on the outlet of the Wemco Unit south of 9th Street), prior to mixing with other waters.

FOOTNOTE(S):

(*1) The pH shall be within the range of 6.0 - 9.0 standard units at all times subject to the continuous monitoring pH range excursion provisions at Part II.I.

(*2) See Part II.J.

PART II

OTHER REQUIREMENTS

In addition to the standard conditions required in all permits and listed in Part III, the Office has established the following additional requirements in accordance with the Louisiana Water Quality Regulations.

A. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations or additional restrictions, if necessary, to maintain the water quality integrity and the designated uses of the receiving water bodies.

B. This permit does not in any way authorize the permittee to discharge a pollutant not listed or quantified in the application or limited or monitored for in the permit.

C. Authorization to discharge pursuant to the conditions of this permit does not relieve the permittee of any liability for damages to state waters or private property. For discharges to private land, this permit does not relieve the permittee from obtaining proper approval from the landowner for appropriate easements and rights of way.

D. For definitions of monitoring and sampling terminology see Part III, Section F.

E. 24-HOUR ORAL REPORTING: DAILY MAXIMUM LIMITATION VIOLATIONS

Under the provisions of Part III.D.6.e.(3) of this permit, violations of daily maximum limitations for the following pollutants shall be reported orally to the Office of Environmental Compliance within 24 hours from the time the permittee became aware of the violation followed by a written report in five days.

VOLATILE COMPOUNDS
Acrylonitrile
Benzene
Carbon Tetrachloride
Chlorobenzene
Chloroethane
Chloroform
1,1-Dichloroethane
1,2-Dichloroethane
1,1-Dichloroethylene
1,2-trans-Dichloroethylene
1,2-Dichloropropane
1,3-Dichloropropylene
Ethylbenzene
Methyl Chloride
Methylene Chloride
Tetrachloroethylene
Toluene
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichloroethylene
Vinyl Chloride

OTHER REQUIREMENTS (continued)

ACID COMPOUNDS
2-Chlorophenol
2,4-Dichlorophenol
2,4-Dimethylphenol
4,6-Dinitro-o-cresol
2,4-Dinitrophenol
2-Nitrophenol
4-Nitrophenol
Phenol

BASE NEUTRAL COMPOUNDS
Acenaphthene
Acenaphthylene
Anthracene
Benzo(a)anthracene
Benzo(a)pyrene
3,4-Benzofluoranthene
Benzo(k)fluoranthene
Bis(2-ethylhexyl)phthalate
Chrysene
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Diethyl phthalate
Dimethyl phthalate
Di-n-butyl phthalate
2,4-Dinitrotoluene
2,6-Dinitrotoluene
Fluoranthene
Fluorene
Hexachlorobenzene
Hexachlorobutadiene
Hexachloroethane
Naphthalene
Nitrobenzene
Phenanthrene
Pyrene
1,2,4-Trichlorobenzene

F. COMPOSITE SAMPLING (24-HOUR)

1. STANDARD PROVISIONS

Unless otherwise specified in this permit, the term "24-hour composite sample" means a sample consisting of a minimum of four (4) aliquots of effluent collected at regular intervals over a normal 24-hour operating day and combined in proportion to flow or a sample continuously collected in proportion to flow over a normal 24-hour operating period.

OTHER REQUIREMENTS (continued)

2. VOLATILE COMPOUNDS

For the "24-hour composite" sampling of volatile compounds using EPA Methods 601, 602, 603, 624, 1624, or any other 40 CFR Part 136 (See LAC 33:IX.4901) method approved after the effective date of the permit, the permittee shall manually collect four (4) aliquots (grab samples) in clean zero head-space containers at regular intervals during the actual hours of discharge during the 24-hour sampling period using sample collection, preservation, and handling techniques specified in the test method. These aliquots must be combined in the laboratory to represent the composite sample of the discharge. One of the following alternative methods shall be used to composite these aliquots.

a. Each aliquot is poured into a syringe. The plunger is added, and the volume in the syringe is adjusted to 1-1/4 ml. Each aliquot (1-1/4 ml.) is injected into the purging chamber of the purge and trap system. After four (4) injections (total 5 ml.), the chamber is purged. Only one analysis or run is required since the aliquots are combined prior to analysis.

b. Chill the four (4) aliquots to 4 Degrees Centigrade. These aliquots must be of equal volume. Carefully pour the contents of each of the four aliquots into a 250-500 ml. flask which is chilled in a wet ice bath. Stir the mixture gently with a clean glass rod while in the ice bath. Carefully fill two (2) or more clean 40 ml. zero head-space vials from the flask and dispose of the remainder of the mixture. Analyze one of the aliquots to determine the concentration of the composite sample. The remaining aliquot(s) are replicate composite samples that can be analyzed if desired or necessary.

c. Alternative sample compositing methods may be used following written approval by this Office.

The individual samples resulting from the application of these compositing methods shall be analyzed following the procedures specified for the selected test method. The resulting analysis shall be reported as the daily composite concentration.

As an option to the above compositing methods, the permittee may manually collect four (4) aliquots (grab samples) in clean zero head-space containers at regular intervals during the actual hours of discharge during the 24-hour sampling period using sample collection, preservation, and handling techniques specified in the test method. A separate analysis shall be conducted for each discrete grab sample following the approved test methods. The determination of daily composite concentration shall be the arithmetic average (weighted by flow) of all grab samples collected during the 24-hour sampling period.

OTHER REQUIREMENTS (continued)

G. 40 CFR PART 136 (See LAC 33:IX.4901) ANALYTICAL REQUIREMENTS

Unless otherwise specified in this permit, monitoring shall be conducted according to analytical, apparatus and materials, sample collection, preservation, handling, etc., procedures listed at 40 CFR Part 136, and in particular, Appendices A, B, and C (See LAC 33:IX.4901).

H. FLOW MEASUREMENT "ESTIMATE" SAMPLE TYPE

If the flow measurement sample type in Part I is specified as "estimate", flow measurements shall not be subject to the accuracy provisions established at Part III.C.6 of this permit. The daily flow value may be estimated using best engineering judgement.

I. pH RANGE EXCURSION PROVISIONS

Where a permittee continuously measures the pH of wastewater as a requirement or option in a Louisiana Pollutant Discharge Elimination System (LPDES) permit, the permittee shall maintain the pH of such wastewater within the range set forth in the permit, except that excursions from the range are permitted, provided:

1. The total time during which the pH values are outside the required range of pH values shall not exceed 446 minutes in any calendar month; and

2. No individual excursion from the range of pH values shall exceed 60 minutes.

For the purposes of this section, an "excursion" is an unintentional and temporary incident in which the pH value of discharge wastewater exceeds the range set forth in the permit.

J. MINIMUM QUANTIFICATION LEVEL (MQL)

If any individual analytical test result is less than the minimum quantification level listed below, a value of zero (0) may be used for that individual result for the Discharge Monitoring Report (DMR) calculations and reporting requirements.

VOLATILE COMPOUNDS	MQL (µg/L)
Acrolein	50
Acrylonitrile	50
Benzene	10
Bromoform	10
Carbon Tetrachloride	10
Chlorobenzene	10
Chlorodibromomethane	10
Chloroethane	50
2-Chloroethylvinylether	10
Chloroform	10
Dichlorobromomethane	10

OTHER REQUIREMENTS (continued)

1,1-Dichloroethane	10
1,2-Dichloroethane	10
1,1-Dichloroethylene	10
1,2-Dichloropropane	10
1,3-Dichloropropylene	10
Ethylbenzene	10
Methyl Bromide [Bromomethane]	50
Methyl Chloride [Chloromethane]	50
Methylene Chloride	20
1,1,2,2-Tetrachloroethane	10
Tetrachloroethylene	10
Toluene	10
1,2-trans-Dichloroethylene	10
1,1,1-Trichloroethane	10
1,1,2-Trichloroethane	10
Trichloroethylene	10
Vinyl Chloride	10

ACID COMPOUNDS	MOL (µg/L)
2-Chlorophenol	10
2,4-Dichlorophenol	10
2,4-Dimethylphenol	10
4,6-Dinitro-o-Cresol [2-Methyl-4,6-Dinitrophenol]	50
2,4-Dinitrophenol	50
2-Nitrophenol	20
4-Nitrophenol	50
p-Chloro-m-Cresol [4-Chloro-3-Methylphenol]	10
Pentachlorophenol	50
Phenol	10
2,4,6-Trichlorophenol	10

BASE/NEUTRAL COMPOUNDS	MOL (µg/L)
Acenaphthene	10
Acenaphthylene	10
Anthracene	10
Benzidine	50
Benzo(a)anthracene	10
Benzo(a)pyrene	10
3,4-Benzofluoranthene	10
Benzo(ghi)perylene	20
Benzo(k)fluoranthene	10
Bis(2-chloroethoxy) Methane	10
Bis(2-chloroethyl) Ether	10
Bis(2-chloroisopropyl) Ether	10
Bis(2-ethylhexyl) Phthalate	10
4-Bromophenyl Phenyl Ether	10
Butylbenzyl Phthalate	10
2-Chloronapthalene	10
4-Chlorophenyl Phenyl Ether	10
Chrysene	10
Dibenzo(a,h)anthracene	20
1,2-Dichlorobenzene	10

OTHER REQUIREMENTS (continued)

1,3-Dichlorobenzene	10
1,4-Dichlorobenzene	10
3,3'-Dichlorobenzidine	50
Diethyl Phthalate	10
Dimethyl Phthalate	10
Di-n-Butyl Phthalate	10
2,4-Dinitrotoluene	10
2,6-Dinitrotoluene	10
Di-n-octyl Phthalate	10
1,2-Diphenylhydrazine	20
Fluoranthene	10
Fluorene	10
Hexachlorobenzene	10
Hexachlorobutadiene	10
Hexachlorocyclopentadiene	10
Hexachloroethane	20
Indeno(1,2,3-cd)pyrene [2,3-o-Phenylene Pyrene]	20
Isophorone	10
Naphthalene	10
Nitrobenzene	10
n-Nitrosodimethylamine	50
n-Nitrosodi-n-Propylamine	20
n-Nitrosodiphenylamine	20
Phenanthrene	10
Pyrene	10
1,2,4-Trichlorobenzene	10

The permittee may develop an effluent specific method detection limit (MDL) in accordance with Appendix B to 40 CFR Part 136 (See LAC 33:IX.4901). For any pollutant for which the permittee determines an effluent specific MDL, the permittee shall send to this Office a report containing QA/QC documentation, analytical results, and calculations necessary to demonstrate that the effluent specific MDL was correctly calculated. An effluent specific minimum quantification level (MQL) shall be determined in accordance with the following calculation:

$$MQL = 3.3 \times MDL$$

Upon written approval by this Office, the effluent specific MQL may be utilized by the permittee for all future Discharge Monitoring Report (DMR) calculations and reporting requirements.

K. The permittee shall achieve compliance with the effluent limitations and monitoring requirements specified for discharges in accordance with the following schedule:

Effective date of the permit

OTHER REQUIREMENTS (continued)

L. PERMIT REOPENER CLAUSE

In accordance with LAC 33:IX.2707.D, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or

2. Controls any pollutant not limited in the permit; or

3. Require reassessment due to change in 303(d) status of waterbody; or

4. Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

M. STORMWATER DISCHARGES

1. Any runoff leaving the developed areas of the facility, other than the permitted outfall(s), exceeding 50 mg/L TOC, 15 mg/L Oil and Grease, or having a pH less than 6.0 or greater than 9.0 standard units shall be a violation of this permit.

N. DISCHARGE MONITORING REPORTS

Monitoring results must be reported on a Discharge Monitoring Report (DMR) form (EPA No. 3320-1 or an approved substitute). All monitoring reports must be retained for a period of at least three (3) years from the date of the sample measurement. The permittee shall make available to this Department, upon request, copies of all monitoring data required by this permit.

If there is a no discharge event at any of the monitored outfall(s) during the reporting period, place an "X" in the NO DISCHARGE box located in the upper right corner of the Discharge Monitoring Report.

Reporting periods shall end on the last day of the month. Monitoring results for each month shall be summarized on a Discharge Monitoring Report (DMR) Form and submitted to this Department per schedule below, postmarked no later than the 15th day of the month following each reporting period.

Permittees shall be required to submit DMR's according to the following schedule or as established in the permit:

For parameter(s) with monitoring frequency(ies) of 1/month or more frequent:

Submit DMR by the 15th day of the following month.

OTHER REQUIREMENTS (continued)

For parameter(s) with monitoring frequency(ies) of 1/quarter:

Monitoring Period	DMR Due Date
January 1 - March 31	April 15th
April 1 - June 30	July 15th
July 1 - September 30	October 15th
October 1 - December 31	January 15th

For parameter(s) with monitoring frequency(ies) of semi-annual:

Monitoring Period	DMR Due Date
January 1 - June 30	July 15th
July 1 - December 31	January 15th

For parameter(s) with monitoring frequency(ies) of 1/year:

Monitoring Period	DMR Due Date
January 1 - December 31	January 15th

Duplicate copies of DMR's (one set of originals and one set of copies) signed and certified as required by LAC 33:IX.2503.B, and all other reports (one set of originals) required by this permit shall be submitted to the Permit Compliance Unit, and the appropriate DEQ regional office (one set of copies) at the following addresses:

Department of Environmental Quality
Office of Environmental Compliance
Permit Compliance Unit
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312

Southeast Regional Office
Office of Environmental Compliance
Surveillance Division
201 Evans Road
Bldg. 4, Suite 420
New Orleans, Louisiana 70123-5230

OTHER REQUIREMENTS (continued)

O. 48 HR ACUTE BIOMONITORING REQUIREMENTS: FRESHWATER

1. SCOPE AND METHODOLOGY

a. The permittee shall test the effluent for toxicity in accordance with the provisions in this section.

APPLICABLE TO OUTFALL(S):	002 (the flow weighted composite of Outfalls 001, 102, & 202)
REPORTED ON DMR AS FINAL OUTFALL:	TX1Y
CRITICAL DILUTION:	0.746%
EFFLUENT DILUTION SERIES:	0.994%, 0.746%, 0.559%, 0.419%, and 0.315%
COMPOSITE SAMPLE TYPE:	Defined at PART I
TEST SPECIES/METHODS:	40 CFR Part 136 (See LAC 33:IX.4901)

Daphnia pulex acute static renewal 48-hour definitive toxicity test using EPA/600/4-90/027F, or the latest update thereof. A minimum of five (5) replicates with ten (10) organisms per replicate must be used in the control and in each effluent dilution of this test.

Pimephales promelas (Fathead minnow) acute static renewal 48-hour definitive toxicity test using EPA/600/4-90/027F, or the latest update thereof. A minimum of five (5) replicates with ten (10) organisms per replicate must be used in the control and in each effluent dilution of this test.

b. The NOEC (No Observed Effect Concentration) is defined as the greatest effluent dilution at and below which lethality that is statistically different from the control (0% effluent) at the 95% confidence level does not occur.

c. This permit may be reopened to require whole effluent toxicity limits, chemical specific effluent limits, additional testing, and/or other appropriate actions to address toxicity.

d. Test failure is defined as a demonstration of statistically significant sub-lethal or lethal effects to a test species at or below the effluent critical dilution.

2. PERSISTENT LETHALITY

The requirements of this subsection apply only when a toxicity test demonstrates significant lethal effects at or below the critical

OTHER REQUIREMENTS (continued)

dilution. Significant lethal effects are herein defined as a statistically significant difference at the 95% confidence level between the survival of the appropriate test organism in a specified effluent dilution and the control (0% effluent).

a. Part I Testing Frequency Other Than Monthly

i. The permittee shall conduct a total of two (2) additional tests for any species that demonstrates significant lethal effects at the critical dilution. The two additional tests shall be conducted monthly during the next two consecutive months. The permittee shall not substitute either of the two additional tests in lieu of routine toxicity testing, unless the specified testing frequency for the species demonstrating significant lethal effects is monthly. The full report shall be prepared for each test required by this section in accordance with procedures outlined in item 4 of this section and submitted with the period discharge monitoring report (DMR) to the permitting authority for review.

ii. If one or both of the two additional tests demonstrates significant lethal effects at or below the critical dilution, the permittee shall initiate Toxicity Reduction Evaluation (TRE) requirements as specified in item 5 of this section. The permittee shall notify this Office in writing within 5 days of the failure in any retest, and the TRE initiation date will be the test completion date of the first failed retest. A TRE may also be required due to a demonstration of intermittent lethal effects at or below the critical dilution, or for failure to perform the required retests.

iii. If one or both of the two additional tests demonstrates significant lethal effects at or below the critical dilution, the frequency of testing for this species shall be once per quarter for the life of the permit.

iv. The provisions of item 2.a are suspended upon submittal of the TRE Action Plan.

b. Part I Testing Frequency of Monthly

The permittee shall initiate the Toxicity Reduction Evaluation (TRE) requirements as specified in item 5 of this section when any two of three consecutive monthly toxicity tests exhibit significant lethal effects at the critical dilution. A TRE may be also required due to demonstration of intermittent lethal effects at or below the critical dilution, or for failure to perform the required retests.

OTHER REQUIREMENTS (continued)

3. REQUIRED TOXICITY TESTING CONDITIONS

a. Test Acceptance

The permittee shall repeat a test, including the control and all effluent dilutions, if the procedures and quality assurance requirements defined in the test methods or in this permit are not satisfied, including the following additional criteria:

i. Each toxicity test control (0% effluent) must have a survival equal to or greater than 90%.

ii. The percent coefficient of variation between replicates shall be 40% or less in the control (0% effluent) for: Daphnia pulex survival test; and Fathead minnow survival test.

iii. The percent coefficient of variation between replicates shall be 40% or less in the critical dilution, unless significant lethal effects are exhibited for: Daphnia pulex survival test; and Fathead minnow survival test.

Test failure may not be construed or reported as invalid due to a coefficient of variation value of greater than 40%. A repeat test shall be conducted within the required reporting period of any test determined to be invalid.

b. Statistical Interpretation

For the Daphnia pulex survival test and the Fathead minnow survival test, the statistical analyses used to determine if there is a statistically significant difference between the control and the critical dilution shall be in accordance with the methods for determining the No Observed Effect Concentration (NOEC) as described in EPA/600/4-90/027F, or the most recent update thereof.

If the conditions of Test Acceptability are met in Item 3.a above and the percent survival of the test organism is equal to or greater than 90% in the critical dilution concentration and all lower dilution concentrations, the test shall be considered to be a passing test regardless of the NOEC, and the permittee shall report a NOEC of not less than the critical dilution for the DMR reporting requirements found in Item 4 below.

c. Dilution Water

i. Dilution water used in the toxicity tests will be receiving water collected as close to the point of discharge as possible but unaffected by the discharge. The permittee shall substitute synthetic dilution water of similar pH,

OTHER REQUIREMENTS (continued)

hardness and alkalinity to the closest downstream perennial water for;

(A) toxicity tests conducted on effluent discharges to receiving water classified as intermittent streams; and

(B) toxicity tests conducted on effluent discharges where no receiving water is available due to zero flow conditions.

ii. If the receiving water is unsatisfactory as a result of instream toxicity (fails to fulfill the test acceptance criteria of item 3.a), the permittee may substitute synthetic dilution water for the receiving water in all subsequent tests provided the unacceptable receiving water test met the following stipulations:

(A) a synthetic dilution water control which fulfills the test acceptance requirements of item 3.a was run concurrently with the receiving water control;

(B) the test indicating receiving water toxicity has been carried out to completion (i.e., 48 hours);

(C) the permittee includes all test results indicating receiving water toxicity with the full report and information required by item 4 below; and

(D) the synthetic dilution water shall have a pH, hardness and alkalinity similar to that of the receiving water or closest downstream perennial water not adversely affected by the discharge, provided the magnitude of these parameters will not cause toxicity in the synthetic dilution water.

d. Samples and Composites

i. The permittee shall collect two flow-weighted composite samples from the outfall(s) listed at item 1.a above.

ii. The permittee shall collect a second composite sample for use during the 24-hour renewal of each dilution concentration for both tests. The permittee must collect the composite samples so that the maximum holding time for any effluent sample shall not exceed 36 hours. The permittee must have initiated the toxicity test within 36 hours after the collection of the last portion of the first composite sample. Samples shall be chilled to 4 degrees Centigrade during collection, shipping and/or storage.

OTHER REQUIREMENTS (continued)

iii. The permittee must collect the composite samples such that the effluent samples are representative of any periodic episode of chlorination, biocide usage or other potentially toxic substance discharged on an intermittent basis.

iv. If the flow from the outfall(s) being tested ceases during the collection of effluent samples, the requirements for the minimum number of effluent samples, the minimum number of effluent portions and the sample holding time are waived during that sampling period. However, the permittee must collect an effluent composite sample volume during the period of discharge that is sufficient to complete the required toxicity tests with daily renewal of effluent. When possible, the effluent samples used for the toxicity tests shall be collected on separate days. The effluent composite sample collection duration and the static renewal protocol associated with the abbreviated sample collection must be documented in the full report required in item 4. of this section.

v. MULTIPLE OUTFALLS: If the provisions of this section are applicable to multiple outfalls, the permittee shall combine the composite effluent samples in proportion to the average flow from the outfalls listed in item 1.a above for the day the sample was collected. The permittee shall perform the toxicity test on the flow-weighted composite of the outfall samples.

4. REPORTING

a. The permittee shall prepare a full report of the results of all tests conducted pursuant to this Part in accordance with the Report Preparation Section of EPA/600/4-90/027F, for every valid or invalid toxicity test initiated, whether carried to completion or not. The permittee shall retain each full report pursuant to the provisions of Part III.C.3 of this permit. For any test which fails, is considered invalid or which is terminated early for any reason, the full report must be submitted for agency review. The permittee shall submit the first full report to:

Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Permit Compliance Unit

b. A valid test for each species must be reported on the DMR during each reporting period specified in Part I of this permit unless the permittee is performing a TRE which may increase the frequency of testing and reporting. Only ONE set of biomonitoring data for

OTHER REQUIREMENTS (continued)

each species is to be recorded on the DMR for each reporting period. The data submitted should reflect the LOWEST Survival results for each species during the reporting period. All invalid tests, repeat tests (for invalid tests), and retests (for tests previously failed) performed during the reporting period must be attached to the DMR for this Office to review.

If a test failure has occurred and the required retests have been performed, the test results are to be reported on the DMR as follows:

Parameter Code	Report
Retest #1 22415	0 Pass, or, 1 Fail
Retest #2 22416	0 Pass, or, 1 Fail

c. The permittee shall report the following results of each valid toxicity test on the subsequent monthly DMR for that reporting period in accordance with Part III.D.4 of this permit. Submit retest information clearly marked as such with the following month's DMR. Only results of valid tests are to be reported on the DMR. The permittee shall submit the Table I summary sheet with each valid test.

i. Pimephales promelas (Fathead minnow)

(A) If the No Observed Effect Concentration (NOEC) for survival is less than the critical dilution, enter a "1"; otherwise, enter a "0" for Parameter No. TEM6C.

(B) Report the NOEC value for survival, Parameter No. TOM6C.

(C) Report the highest (critical dilution or control) Coefficient of Variation, Parameter No. TQM6C.

ii. Daphnia pulex

(A) If the NOEC for survival is less than the critical dilution, enter a "1"; otherwise, enter a "0" for Parameter No. TEM3D.

(B) Report the NOEC value for survival, Parameter No. TOM3D.

(C) Report the highest (critical dilution or control) Coefficient of Variation, Parameter No. TQM3D.

The permittee shall submit the toxicity testing information contained in Table 1 of this permit with the DMR subsequent to each and every toxicity test reporting period. The DMR and the summary table should be sent to the address indicated in 4.a. The permittee is not required to send the first complete report nor summary tables to EPA.

OTHER REQUIREMENTS (continued)

Monitoring Frequency Reduction

i. The permittee may apply for a testing frequency reduction upon the successful completion of the first four consecutive quarters of testing for one or both test species, with no lethal or sub-lethal effects demonstrated at or below the critical dilution. If granted, the monitoring frequency for that test species may be reduced to not less than once per year for the less sensitive species (usually the Fathead minnow) and not less than once per six months for the more sensitive test species (usually the Daphnia pulex). Monitoring frequency reduction shall not apply to monitoring frequencies of once per year.

ii. CERTIFICATION - The permittee must certify in writing that no test failures have occurred and that all tests meet all test acceptability criteria in item 3.a. above. In addition, the permittee must provide a list with each test performed including test initiation date, species, NOEC's for lethal and sub-lethal effects and the maximum coefficient of variation for the controls. Upon review and acceptance of this information the agency will issue a letter of confirmation of the monitoring frequency reduction. A copy of the letter will be forwarded to the agency's Permit Compliance Unit to update the permit reporting requirements.

iii. SURVIVAL FAILURES - If any test fails the survival endpoint at any time during the life of this permit, two monthly retests are required and the monitoring frequency for the affected test species shall be increased to once per quarter until the permit is reissued. Monthly retesting is not required if the permittee is performing a TRE.

iv. This monitoring frequency reduction applies only until the expiration date of this permit, at which time the monitoring frequency for both test species reverts to once per quarter until the permit is reissued.

5. TOXICITY REDUCTION EVALUATION (TRE)

a. Within ninety (90) days of confirming lethality in the retests, the permittee shall submit a Toxicity Reduction Evaluation (TRE) Action Plan and Schedule for conducting a TRE. The TRE Action Plan shall specify the approach and methodology to be used in performing the TRE. A Toxicity Reduction Evaluation is an investigation intended to determine those actions necessary to achieve compliance with water quality-based effluent limits by reducing an effluent's toxicity to an acceptable level. A TRE is defined as a step-wise process which combines toxicity testing and analyses of the physical and chemical characteristics of a toxic

OTHER REQUIREMENTS (continued)

effluent to identify the constituents causing effluent toxicity and/or treatment methods which will reduce the effluent toxicity. The TRE Action Plan shall lead to the successful elimination of effluent toxicity at the critical dilution and include the following:

i. Specific Activities. The plan shall detail the specific approach the permittee intends to utilize in conducting the TRE. The approach may include toxicity characterizations, identifications and confirmation activities, source evaluation, treatability studies, or alternative approaches. When the permittee conducts Toxicity Characterization Procedures the permittee shall perform multiple characterizations and follow the procedures specified in the document "Methods for Aquatic Toxicity Identification Evaluations: Phase I Toxicity Characterization Procedures" (EPA-600/6-91/003) or alternate procedures. When the permittee conducts Toxicity Identification Evaluations and Confirmations, the permittee shall perform multiple identifications and follow the methods specified in the documents "Methods for Aquatic Toxicity Identification Evaluations, Phase II Toxicity Identification Procedures for Samples Exhibiting Acute and Chronic Toxicity" (EPA/600/R-92/080) and "Methods for Aquatic Toxicity Identification Evaluations, Phase III Toxicity Confirmation Procedures for Samples Exhibiting Acute and Chronic Toxicity" (EPA/600/R-92/081), as appropriate.

The documents referenced above may be obtained through the National Technical Information Service (NTIS) by phone at (703) 487-4650, or by writing:

U.S. Department of Commerce
National Technical Information Service
5285 Port Royal Road
Springfield, Va. 22161

ii. Sampling Plan (e.g., locations, methods, holding times, chain of custody, preservation, etc.). The effluent sample volume collected for all tests shall be adequate to perform the toxicity test, toxicity characterization, identification and confirmation procedures, and conduct chemical specific analyses when a probable toxicant has been identified;

Where the permittee has identified or suspects specific pollutant(s) and/or source(s) of effluent toxicity, the permittee shall conduct, concurrent with toxicity testing, chemical specific analyses for the identified and/or suspected pollutant(s) and/or source(s) of effluent toxicity. Where lethality was demonstrated within 24 hours of test initiation, each composite sample shall be analyzed independently. Otherwise the permittee may substitute a

OTHER REQUIREMENTS (continued)

composite sample, comprised of equal portions of the individual composite samples, for the chemical specific analysis;

iii. Quality Assurance Plan (e.g., QA/QC implementation, corrective actions, etc.); and

iv. Project Organization (e.g., project staff, project manager, consulting services, etc.).

b. The permittee shall initiate the TRE Action Plan within thirty (30) days of plan and schedule submittal. The permittee shall assume all risks for failure to achieve the required toxicity reduction.

c. The permittee shall submit a quarterly TRE Activities Report, with the Discharge Monitoring Report in the months of January, April, July and October, containing information on toxicity reduction evaluation activities including:

i. any data and/or substantiating documentation which identifies the pollutant(s) and/or source(s) of effluent toxicity;

ii. any studies/evaluations and results on the treatability of the facility's effluent toxicity; and

iii. any data which identifies effluent toxicity control mechanisms that will reduce effluent toxicity to the level necessary to meet no significant lethality at the critical dilution.

The TRE Activities Report shall be submitted to the following addresses:

Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Permit Compliance Unit

U.S. Environmental Protection Agency, Region 6
Water Enforcement Branch, 6 EN-WC
1445 Ross Avenue
Dallas, Texas 75202

d. The permittee shall submit a Final Report on Toxicity Reduction Evaluation Activities no later than twenty-eight (28) months from confirming lethality in the retests, which provides information pertaining to the specific control mechanism selected that will, when implemented, result in reduction of effluent toxicity to no

OTHER REQUIREMENTS (continued)

significant lethality at the critical dilution. The report will also provide a specific corrective action schedule for implementing the selected control mechanism.

A copy of the Final Report on Toxicity Reduction Evaluation Activities shall also be submitted to the above addresses.

e. Quarterly testing during the TRE is a minimum monitoring requirement. LDEQ recommends that permittees required to perform a TRE not rely on quarterly testing alone to ensure success in the TRE, and that additional screening tests be performed to capture toxic samples for identification of toxicants. Failure to identify the specific chemical compound causing toxicity test failure will normally result in a permit limit for whole effluent toxicity limits per federal regulations at 40 CFR 122.44(d)(1)(v) and state regulations at LAC 33:IX.2707.D.1.e.

TABLE 1
SUMMARY SHEET

Daphnia pulex ACUTE SURVIVAL TEST RESULTS

PERMITTEE: Chevron Oronite Company, LLC
FACILITY SITE: Oak Point Plant
LPDES PERMIT NUMBER: LA0005738, 1708
OUTFALL IDENTIFICATION: 001 & 002
OUTFALL SAMPLE IS FROM _____ SINGLE _____ MULTIPLE DISCHARGES
BIOMONITORING LABORATORY: _____
DILUTION WATER USED: _____ RECEIVING WATER _____ LAB WATER
CRITICAL DILUTION 0.746% DATE TEST INITIATED _____

Are the test results to be considered valid? ____yes ____no
If __X__no (test invalid), what are the reasons for invalidity?

Is this a retest of a previous invalid test? ____ yes____no
Is this a retest of a previous test failure? ____ yes____no

NOEC = ____% effluent
$LC_{50}48$ = ____% effluent

DILUTION SERIES RESULTS
percent survival

TIME OF READING	REP	0%	0.994%	0.746%	0.559%	0.419%	0.315%
24-HOUR	A						
	B						
	C						
	D						
	E						
48-HOUR	A						
	B						
	C						
	D						
	E						
MEAN							

Is the mean survival at 48 hours significantly less (p=0.05) than the control survival for the low flow or critical dilution?

_____yes _____no

TABLE 2
SUMMARY SHEET

Pimephales promelas ACUTE SURVIVAL TEST RESULTS

PERMITTEE: Chevron Oronite Company, LLC
FACILITY SITE: Oak Point Plant
LPDES PERMIT NUMBER: LA0005738, 1708
OUTFALL IDENTIFICATION: 001 & 002
OUTFALL SAMPLE IS FROM _____ SINGLE _____ MULTIPLE DISCHARGES
BIOMONITORING LABORATORY: _____
DILUTION WATER USED: _____ RECEIVING WATER _____LAB WATER
CRITICAL DILUTION 0.746% DATE TEST INITIATED _____

Are the test results to be considered valid? ____yes ____no
If __X__no (test invalid), what are the reasons for invalidity?

Is this a retest of a previous invalid test? ____ yes____no
Is this a retest of a previous test failure? ____ yes____no

NOEC = _____% effluent
$LC_{50}48$ = _____% effluent

DILUTION SERIES RESULTS
percent survival

TIME OF READING	REP	0%	0.994%	0.746%	0.559%	0.419%	0.315%
24-HOUR	A						
	B						
	C						
	D						
	E						
48-HOUR	A						
	B						
	C						
	D						
	E						
MEAN							

Is the mean survival at 48 hours significantly less (p=0.05) than the control survival for the low flow or critical dilution?
_____yes _____no

PART III
STANDARD CONDITIONS FOR LPDES PERMITS

SECTION A. GENERAL CONDITIONS

1. Introduction
In accordance with the provisions of LAC 33:IX.2701, et. seq., this permit incorporates either expressly or by reference ALL conditions and requirements applicable to Louisiana Pollutant Discharge Elimination System Permits (LPDES) set forth in the Louisiana Environmental Quality Act (LEQA), as amended, as well as ALL applicable regulations.

2. Duty to Comply
The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act (CWA) and the Louisiana Environmental Quality Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

3. Penalties for Violation of Permit Conditions
   a. LA. R. S. 30:2025 provides for civil penalties for violations of these regulations and the Louisiana Environmental Quality Act. LA. R. S. 30:2076.2 provides for criminal penalties for violation of any provisions of the LPDES or any order or any permit condition or limitation issued under or implementing any provisions of the LPDES program. (See Section E. Penalties for Violation of Permit Conditions for additional details).

   b. Any person may be assessed an administrative penalty by the State Administrative Authority under LA. R. S. 30:2025 for violating a permit condition or limitation implementing any of the requirements of the LPDES program in a permit issued under the regulations or the Louisiana Environmental Quality Act.

4. Toxic Pollutants
   a. Other effluent limitations and standards under Sections 301, 302, 303, 307, 318, and 405 of the Clean Water Act. If any applicable toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is promulgated under Section 307(a) of the Clean Water Act for a toxic pollutant and that standard or prohibition is more stringent than any limitation on the pollutant in this permit, the state administrative authority shall institute proceedings under these regulations to modify or revoke and reissue the permit to conform to the toxic effluent standard or prohibition.

   b. The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under Section 405(d) of the Clean Water Act within the time provided in the regulations that establish these standards or prohibitions, or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.

5. Duty to Reapply
   a. Individual Permits. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The new application shall be submitted at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the state administrative authority. (The state administrative authority shall not grant permission for applications to be submitted later than the expiration date of the existing permit.) Continuation of expiring permits shall be governed by regulations promulgated at LAC 33:IX.2321 and any subsequent amendments.

   b. General Permits. General permits expire five years after the effective date. Unless otherwise specified in the general permit, or notified by the Secretary or his designee, a permittee must submit an NOI/application for the permitted activity.

6. Permit Action
This permit may be modified, revoked and reissued, or terminated for cause in accordance with LAC 33:IX.2903, 2905, 2907, 3105 and 6509. The causes may include, but are not limited to, the following:

a. Noncompliance by the permittee with any condition of the permit;

b. The permittee's failure in the application or during the permit issuance process to disclose fully all relevant acts, or the permittee's misrepresentation of any relevant facts at any time;

c. A determination that the permitted activity endangers human health or the environment and can only be regulated to acceptable levels by permit modification or termination;

d. A change in any condition that requires either a temporary or a permanent reduction or elimination of any discharge; or

e. Failure to pay applicable fees under the provisions of LAC 33: IX. Chapter 13;

f. Change of ownership or operational control;

The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

7. Property Rights
This permit does not convey any property rights of any sort, or any exclusive privilege.

8. Duty to Provide Information
The permittee shall furnish to the state administrative authority, within a reasonable time, any information which the state administrative authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the state administrative authority, upon request, copies of records required to be kept by this permit.

9. Criminal and Civil Liability
Except as provided in permit conditions on "Bypassing" and "Upsets", nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. Any false or materially misleading representation or concealment of information required to be reported by the provisions of the permit, the Act, or applicable regulations, which avoids or effectively defeats the regulatory purpose of the Permit may subject the Permittee to criminal enforcement pursuant to La. R.S. 30:2025.

10. Oil and Hazardous Substance Liability
Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Clean Water Act.

11. State Laws
Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Clean Water Act.

12. Severability
If any provision of these rules and regulations, or the application thereof, is held to be invalid, the remaining provisions of these rules and regulations shall not be affected, so long as they can be given effect without the invalid provision. To this end, the provisions of these rules and regulations are declared to be severable.

13. Dilution
A permittee shall not achieve any effluent concentration by dilution unless specifically authorized in the permit. A permittee shall not increase the use of process water or cooling water or otherwise attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve permit limitations or water quality.

SECTION B. PROPER OPERATION AND MAINTENANCE

1. Need to Halt or Reduce not a Defense
It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

2. Duty to Mitigate
The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
The permittee shall also take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

3. Proper Operation and Maintenance

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and other functions necessary to ensure compliance with the conditions of this permit.

4. Bypass of Treatment Facilities

a. ***Bypass***. The intentional diversion of waste streams from any portion of a treatment facility.

b. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Section B.4.c. and 4.d of these standard conditions.

c. Notice

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the Office of Environmental Services, Permits Division, if possible at least ten days before the date of the bypass.

(2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in LAC 33:IX.2701.L.6, (24-hour notice) and Section D.6.e. of these standard conditions.

d. Prohibition of bypass

(1) Bypass is prohibited, and the state administrative authority may take enforcement action against a permittee for bypass, unless:

(a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and,

(c) The permittee submitted notices as required by Section B.4.c of these standard conditions.

(2) The state administrative authority may approve an anticipated bypass after considering its adverse effects, if the state administrative authority determines that it will meet the three conditions listed in Section B.4.d(1) of these standard conditions.

5. Upset Conditions

a. **Upset**. An exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of Section B.5.c. are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the permittee can identify the cause(s) of the upset;

(2) The permitted facility was at the time being properly operated; and

(3) The permittee submitted notice of the upset as required by LAC 33:IX.2701.L.6.b.ii. and Section D.6.e.(2) of these standard conditions; and

(4) The permittee complied with any remedial measures required by Section B.2 of these standard conditions.

d. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

6. Removed Substances
Solids, sewage sludges, filter backwash, or other pollutants removed in the course of treatment or wastewater control shall be properly disposed of in a manner such as to prevent any pollutant from such materials from entering waters of the state and in accordance with environmental regulations.

7. Percent Removal
For publicly owned treatment works, the 30-day average percent removal for Biochemical Oxygen Demand and Total Suspended Solids shall not be less than 85 percent in accordance with LAC 33:IX.5905.A.3. and B.3.

SECTION C. MONITORING AND RECORDS

1. Inspection and Entry
The permittee shall allow the state administrative authority, or an authorized representative (including an authorized contractor acting as a representative of the Administrator), upon the presentation of credentials and other documents as may be required by the law to:

a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.

Enter upon the permittee's premises where a discharge source is or might be located or in which monitoring

equipment or records required by a permit are kept for inspection or sampling purposes. Most inspections will be unannounced and should be allowed to begin immediately, but in no case shall begin more than thirty (30) minutes after the time the inspector presents his/her credentials and announces the purpose(s) of the inspection. Delay in excess of thirty (30) minutes shall constitute a violation of this permit. However, additional time can be granted if the inspector or the Administrative Authority determines that the circumstances warrant such action; and

b. Have access to and copy, at reasonable times, any records that the department or its authorized representative determines are necessary for the enforcement of this permit. For records maintained in either a central or private office that is open only during normal office hours and is closed at the time of inspection, the records shall be made available as soon as the office is open, but in no case later than the close of business the next working day;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act or the Louisiana Environmental Quality Act, any substances or parameters at any location.

e. Sample Collection

(1) When the inspector announces that samples will be collected, the permittee will be given an additional thirty (30) minutes to prepare containers in order to collect duplicates. If the permittee cannot obtain and prepare sample containers within this time, he is considered to have waived his right to collect duplicate samples and the sampling will proceed immediately. Further delay on the part of the permittee in allowing initiation of the sampling will constitute a violation of this permit.

(2) At the discretion of the administrative authority, sample collection shall proceed immediately (without the additional 30 minutes described in Section C.1.a. above) and the inspector shall supply the permittee with a duplicate sample.

f. It shall be the responsibility of the permittee to ensure that a facility representative familiar with provisions of its wastewater discharge permit, including any other conditions or limitations, be available either by phone or in person at the facility during all hours of operation. The absence of such personnel on-site who are familiar with the permit shall not be grounds for delaying the initiation of an inspection except in situations as described in Section C.1.b. of these standard conditions. The permittee shall be responsible for providing witnesses/escorts during inspections. Inspectors shall abide by all company safety rules and shall be equipped with standard safety equipment (hard hat, safety shoes, safety glasses) normally required by industrial facilities.

g. Upon written request copies of field notes, drawings, etc., taken by department personnel during an inspection shall be provided to the permittee after the final inspection report has been completed.

2. Representative Sampling
Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. All samples shall be taken at the outfall location(s) indicated in the permit. The state administrative authority shall be notified prior to any changes in the outfall location(s). Any changes in the outfall location(s) will be subject to modification, revocation and reissuance in accordance with LAC 33:IX.2903.

3. Retention of Records
Except for records of monitoring information required by this permit related to the permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least five years (or longer as required by 40 CFR 503), the permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports

required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. This period may be extended by request of the state administrative authority at any time.

4. Record Contents
Records of monitoring information shall include:

a. The date, exact place, and time of sampling or measurements;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) analyses were performed;
d. The time(s) analyses were begun and ended
e. The individual(s) who performed the analyses;
f. The analytical techniques or methods used;
g. The results of such analyses; and
h. The results of all quality control procedures.

5. Monitoring Procedures
a. Monitoring results must be conducted according to test procedures approved under 40 CFR Part 136 (See LAC 33:IX.4901) or, in the case of sludge use or disposal, approved under 40 CFR part 136 (See LAC 33:IX.4901) unless otherwise specified in 40 CFR part 503, unless other test procedures have been specified in this permit. This includes procedures contained in the latest EPA approved edition of the following publications:

(1) "Standard Methods for the Examination of Water and Waste Water". This publication is available from the American Public Health Association, Publication Sales, P. O. Box 753, Waldorf, MD 20604-0573, Phone number (301) 893-1894, Fax number (301) 843-0159.

(2) "Annual Book of Standards, Vols 1101-1103, Water I, Water II, and Atmospheric Analysis". This publication is available from the American Society for Testing Materials, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, Phone number (610) 832-9500.

(3) "Methods for Chemical Analysis of Water and Wastes, Revised, March 1983," U.S. Environmental Protection Agency, Analytical Quality Control Laboratory, Cincinnati, Ohio. This publication is available from the National Technical Information Service (NTIS), Springfield, VA 22161, Phone number (800) 553-6847. Order by NTIS publication number PB-84-128677.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory. General sampling protocol shall follow guidelines established in the "Handbook for Sampling and Sample Preservation of Water and Wastewater, 1982" U.S. Environmental Protection Agency. This publication is available from the National Technical Information Service (NTIS), Springfield, VA 22161, Phone number (800) 553-6847. Order by NTIS publication number PB-83-124503. General laboratory procedures including glassware cleaning, etc. can be found in the "Handbook for Analytical Quality Control in Water and Wastewater Laboratories, 1979," U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory. This publication is available from the Environmental Protection Agency, Phone number (513) 569-7562. Order by EPA publication number EPA-600/4-79-019.

6. Flow Measurements
Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the measurements are

consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes. Guidance in selection, installation, calibration and operation of acceptable flow measurement devices can be obtained from the following references:

a. "A Guide to Methods and Standards for the Measurement of Water Flow, 1975," U.S. Department of Commerce, National Bureau of Standards. This publication is available from the National Technical Information Service (NTIS), Springfield, VA 22161, Phone number (800) 553-6847. Order by NTIS publication number COM-75-10683.

b. "Flow Measurement in Open Channels and Closed Conduits, Volumes 1 and 2," U.S. Department of Commerce, National Bureau of Standards. This publication is available from the National Technical Service (NTIS), Springfield, VA, 22161, Phone number (800) 553-6847. Order by NTIS publication number PB-273 535.

c. "NPDES Compliance Flow Measurement Manual," U.S. Environmental Protection Agency, Office of Water Enforcement. This publication is available from the National Technical Information Service (NTIS), Springfield, VA 22161, Phone number (800) 553-6847. Order by NTIS publication number PB-82-131178.

7. Prohibition for Tampering: Penalties

a. LA R.S. 30:2025 provides for punishment of any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit.

b. LA R.S. 30:2076.2 provides for penalties for any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non compliance.

8. Additional Monitoring by the Permittee

If the Permittee monitors any pollutant more frequently than required by the permit using test procedures approved under 40 CFR Part 136 (See LAC 33:IX.4901) or, in the case of sludge use and disposal, approved under 40 CFR part 136 (See LAC 33:IX.4901) unless otherwise specified in 40 CFR part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the state administrative authority.

9. Averaging of Measurements

Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the state administrative authority in the permit.

10. Laboratory Accreditation

a. LAC 33:I.Subpart 3, Chapters 45-59 provide requirements for an accreditation program specifically applicable to commercial laboratories, wherever located, that provide chemical analyses, analytical results, or other test data to the department, by contract or by agreement, and the data is:

(1) Submitted on behalf of any facility, as defined in R.S.30:2004;
(2) Required as part of any permit application;
(3) Required by order of the department;
(4) Required to be included on any monitoring reports submitted to the department;
(5) Required to be submitted by contractor
(6) Otherwise required by department regulations.

b. The department laboratory accreditation program is designed to ensure the accuracy, precision, and reliability of the data generated, as well as the use of department-approved methodologies in generation of that data. Laboratory data generated by commercial environmental laboratories that are not accredited under these regulations will not be accepted by the department. Retesting of analysis will be required by an accredited

commercial laboratory.

Where retesting of effluent is not possible (i.e. data reported on DMRs for prior month's sampling), the data generated will be considered invalid and in violation of the LPDES permit.

c. Regulations on the Environmental Laboratory Accreditation Program and a list of labs that have applied for accreditation, are available on the department website located at:

http://www.deq.state.la.us/laboratory/index.htm.

Questions concerning the program may be directed to (225) 765-0582.

SECTION D. REPORTING REQUIREMENTS

1. Facility Changes
The permittee shall give notice to the state administrative authority as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when:

a. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or

b. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under LAC 33:IX.2703.A.1.

c. For Municipal Permits. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to Section 301, or 306 of the CWA if it were directly discharging those pollutants; and any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit. In no case are any new connections, increased flows, or significant changes in influent quality permitted that will cause violation of the effluent limitations specified herein.

2. Anticipated Noncompliance
The permittee shall give advance notice to the state administrative authority of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

3. Transfers
This permit is not transferable to any person except after notice to the state administrative authority. The state administrative authority may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Clean Water Act or the Louisiana Environmental Quality Act. (See LAC 33:IX.2901; in some cases, modification or revocation and reissuance is mandatory.)

a. Transfers by modification. Except as provided in LAC 33: IX.2901.B, a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued (under LAC 33:IX.2903. A.2.b), or a minor modification made (under LAC 33:IX.2905) to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act and the Louisiana Environmental Quality Act.

b. Automatic transfers. As an alternative to transfers under LAC 33:IX.2901.A, any LPDES permit may be automatically transferred to a new permittee if:

(1) The current permittee notifies the state administrative authority at least 30 days in advance of the proposed transfer date in Section D.3.b.(2) below;

(2) The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them;

(3) The state administrative authority does not notify the existing permittee and the proposed new permittee of his or her intent to modify or revoke and reissue the permit. A modification under this subsection may also be a minor modification under LAC 33:IX.2905. If this notice is not received, the transfer is effective on the date specified in the agreement mentioned in Section D.3.b.(2) of these standard conditions.

4. Monitoring Reports

Monitoring results shall be reported at the intervals and in the form specified in Part I or Part II of this permit.

The permittee shall submit properly completed Discharge Monitoring Reports (DMRs) on the form specified in the permit. Preprinted DMRs are provided to majors/92-500's and other designated facilities. Please contact the Permit Compliance Unit concerning preprints. Self-generated DMRs must be pre-approved by the Permit Compliance Unit prior to submittal. Self-generated DMRs are approved on an individual basis. Requests for approval of self-generated DMRs should be submitted to:

Supervisor, Permit Compliance Unit
Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, LA 70821-4312

Copies of blank DMR templates, plus instructions for completing them, and EPA's LPDES Reporting Handbook are available at the department website located at:

http://www.deq.state.la.us/enforcement/index.htm

5. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

6. Requirements for Notification

a. Emergency Notification

As required by LAC 33.I.3915, in the event of an unauthorized discharge that does cause an emergency condition, the discharger shall notify the hotline (DPS 24-hour Louisiana Emergency Hazardous Materials Hotline) by telephone at (225) 925-6595 (collect calls accepted 24 hours a day) immediately (a reasonable period of time after taking prompt measures to determine the nature, quantity, and potential off-site impact of a release, considering the exigency of the circumstances), but in no case later than one hour after learning of the discharge. (An emergency condition is any condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property.) Notification required by this section will be made regardless of the amount of discharge. Verbal Notification Procedures are listed in Section D.6.c. of these standard conditions.

A written report shall be provided within seven calendar days after the telephone notification. The report shall contain the information listed in Section D.6.d. of these standard conditions and any additional information in LAC 33:I.3925.B.

b. Prompt Notification

As required by LAC 33:I.3917, in the event of an unauthorized discharge which exceeds reportable quantity specified in LAC 33:I.Subchapter E, but does not cause an emergency condition, the discharger shall notify the Office of Environmental Compliance by e-mail utilizing the Incident Report Form and procedures found at www.deq.state.la.us/surveillance or by telephone within 24 hours after learning of the discharge. Otherwise,

verbal notification should be made to the Office of Environmental Compliance at (225) 219-3640 during office hours or (225) 342-1234 after hours, weekends, and holidays.

c. Information for Verbal Notifications. The following guidelines will be utilized as appropriate, based on the conditions and circumstances surrounding any unauthorized discharge, to provide relevant information regarding the nature of the discharge:

(1) name of person making the notification and telephone number where any return calls from response agencies can be placed;

(2) name and location of facility or site where the unauthorized discharge is imminent or has occurred using common landmarks. In the event of an incident involving transport, include the name and address of transporter and generator;

(3) date and time the incident began and ended, or estimated time of continuation if discharge is continuing;

(4) extent of any injuries and identification of any known personnel hazards which response agencies may face;

(5) common or scientific chemical name, U.S. Department of Transportation hazard classification, and best estimate of amounts of any and all discharged pollutants;

(6) brief description of the incident sufficient to allow response agencies to formulate level and extent of response activity.

d. Written Notification Procedures. Written reports for any unauthorized discharge that requires verbal notification under Section D.6.a. or 6.b., or that requires written notification under LAC 33:I.3925, will be submitted by the discharger to the department in accordance with this section within seven calendar days after the telephone notification. Written notification reports will include, but are not limited to, the following information:

(1) name of person, company, or other party who is filing the written report;

(2) time and date of verbal notification, name of person making the notification, and identification of the site or facility, vessel, transport vehicle, or storage area from which the unauthorized discharge occurred;

(3) date(s), time(s), and duration of the unauthorized discharge and, if not corrected, the anticipated time it is expected to continue;

(4) details of the circumstances and events leading to any emergency condition, including incidents of loss of sources of radiation;

(5) common or scientific chemical name, the CAS number, U.S. Department of Transportation hazard classification, and best estimate of amounts of any and all discharge pollutants, including methodology for calculations and estimates;

(6) statement of actual or probable fate or disposition of the pollutant or source of radiation;

(7) remedial actions taken, or to be taken, to stop unauthorized discharges or to recover pollutants or sources of radiation.

Please see LAC 33:I.3925.B for additional written notification procedures.

e. Twenty-four Hour Reporting. The permittee shall report any noncompliance which may endanger human health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time

the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and; steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The following shall be included as information which must be reported within 24hours:

(1) Any unanticipated bypass which exceeds any effluent limitation in the permit (see LAC 33:IX.2701.M.3.b.);

(2) Any upset which exceeds any effluent limitation in the permit;

(3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the state administrative authority in Part II of the permit to be reported within 24 hours (LAC 33:IX.2707.G.).

7. Other Noncompliance
The permittee shall report all instances of noncompliance not reported under Section D.4., 5., and 6., at the time monitoring reports are submitted. The reports shall contain the information listed in Section D.6.e.

8. Other Information
Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the state administrative authority, it shall promptly submit such facts or information.

9. Discharges of Toxic Substances
In addition to the reporting requirements under Section D.1-8, all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Office of Environmental Services, Permits Division as soon as they know or have reason to believe:

a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant:

i. listed at LAC 33:IX.7107, Tables II and III (excluding Total Phenols) which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

(1) One hundred micrograms per liter (100 μg/L);
(2) Two hundred micrograms per liter (200 μg/L) for acrolein and acrylonitrile; five hundred micro-grams per liter (500 μg/L) for 2,4 -dinitro-phenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
(3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with LAC33:IX.2501.G.7; or
(4) The level established by the state administrative authority in accordance with LAC 33:IX.2707.F.; or

ii. which exceeds the reportable quantity levels for pollutants at LAC 33:I. Subchapter E.

b. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant:

i. listed at LAC 33:IX.7107, Tables II and III (excluding Total Phenols) which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(1) Five hundred micrograms per liter (500 μg/L);
(2) One milligram per liter (1 mg/L) for antimony;
(3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with LAC 33:IX.2501.G.7; or
(4) The level established by the state administrative authority in accordance with LAC 33:IX.2707.F.; or

ii. which exceeds the reportable quantity levels for pollutants at LAC 33:I. Subchapter E.

10. Signatory Requirements
All applications, reports, or information submitted to the state administrative authority shall be signed and certified.

a. All permit applications shall be signed as follows:

(1) For a corporation - by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:

(a) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or,

(b) The manager of one or more manufacturing, production, or operating facilities, provided: the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations and initiating and directing other comprehensive measures to ensure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and the authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

NOTE: DEQ does not require specific assignments or delegations of authority to responsible corporate officers identified in Section D.10.a.(1)(a). The agency will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the state administrative authority to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under Section D.10.a.(1)(b), rather than to specific individuals.

(2) For a partnership or sole proprietorship - by a general partner or the proprietor, respectively; or
(3) For a municipality, state, federal, or other public agency - by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a federal agency includes:

(a) The chief executive officer of the agency, or
(b) A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

b. All reports required by permits and other information requested by the state administrative authority shall be signed by a person described in Section D.10.a., or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in Section D.10.a. of these standard conditions;
(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (a duly authorized representative may thus be either a named individual or an individual occupying a named position; and,
(3) The written authorization is submitted to the state administrative authority.

c. Changes to authorization. If an authorization under Section D.10.b. is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Section D.10.b. must be submitted to the state administrative authority prior to or together with

any reports, information, or applications to be signed by an authorized representative.

d. Certification. Any person signing a document under Section D.10. a. or b. above, shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. Availability of Reports

All recorded information (completed permit application forms, fact sheets, draft permits, or any public document) not classified as confidential information under R.S. 30:2030(A) and 30:2074(D) and designated as such in accordance with these regulations (LAC 33:IX.2323 and LAC 33:IX.6503) shall be made available to the public for inspection and copying during normal working hours in accordance with the Public Records Act, R.S. 44:1 et seq.

Claims of confidentiality for the following will be denied:

a. The name and address of any permit applicant or permittee;
b. Permit applications, permits, and effluent data.
c. Information required by LPDES application forms provided by the state administrative authority under LAC 33:IX.2501 may not be claimed confidential. This includes information submitted on the forms themselves and any attachments used to supply information required by the forms.

SECTION E. PENALTIES FOR VIOLATIONS OF PERMIT CONDITION

1. Criminal

a. Negligent Violations

The Louisiana Revised Statutes LA. R. S. 30:2076.2 provides that any person who negligently violates any provision of the LPDES, or any order issued by the secretary under the LPDES, or any permit condition or limitation implementing any such provision in a permit issued under the LPDES by the secretary, or any requirement imposed in a pretreatment program approved under the LPDES is subject to a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than 1 year, or both. If a conviction of a person is for a violation committed after a first conviction of such person, he shall be subject to a fine of not more than $50,000 per day of violation, or imprisonment of not more than two years, or both.

b. Knowing Violations

The Louisiana Revised Statutes LA. R. S. 30:2076.2 provides that any person who knowingly violates any provision of the LPDES, or any permit condition or limitation implementing any such provisions in a permit issued under the LPDES, or any requirement imposed in a pretreatment program approved under the LPDES is subject to a fine of not less than $5,000 nor more than $50,000 per day of violation, or imprisonment for not more than 3 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person, he shall be subject to a fine of not more than $100,000 per day of violation, or imprisonment of not more than six years, or both.

c. Knowing Endangerment

The Louisiana Revised Statutes LA. R. S. 30:2076.2 provides that any person who knowingly violates any provision of the LPDES, or any order issued by the secretary under the LPDES, or any permit condition or limitation implementing any of such provisions in a permit issued under the LPDES by the secretary, and who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than $250,000, or by imprisonment for not more than 15 years, or both. A person which is an organization shall, upon conviction of violating this Paragraph, be subject to a fine of not more than one million dollars. If a conviction of a person is for a violation committed after a first

conviction of such person under this Paragraph, the maximum punishment shall be doubled with respect to both fine and imprisonment.

d. False Statements
The Louisiana Revised Statutes LA. R. S. 30:2076.2 provides that any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under the LPDES or who knowingly falsifies, tampers with, or renders inaccurate, any monitoring device or method required to be maintained under the LPDES, shall, upon conviction, be subject to a fine of not more than $10,000, or imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this Subsection, he shall be subject to a fine of not more than $20,000 per day of violation, or imprisonment of not more than 4 years, or both.

2. Civil Penalties
The Louisiana Revised Statutes LA. R. S. 30:2025 provides that any person found to be in violation of any requirement of this Subtitle may be liable for a civil penalty, to be assessed by the secretary, an assistant secretary, or the court, of not more than the cost to the state of any response action made necessary by such violation which is not voluntarily paid by the violator, and a penalty of not more than $27,500 for each day of violation. However, when any such violation is done intentionally, willfully, or knowingly, or results in a discharge or disposal which causes irreparable or severe damage to the environment or if the substance discharged is one which endangers human life or health, such person may be liable for an additional penalty of not more than one million dollars.

(PLEASE NOTE: These penalties are listed in their entirety in Subtitle II of Title 30 of the Louisiana Revised Statutes.)

SECTION F. DEFINITIONS

All definitions contained in Section 502 of the Clean Water Act shall apply to this permit and are incorporated herein by reference. Unless otherwise specified in this permit, additional definitions of words or phrases used in this permit are as follows:

1. "Clean Water Act" (CWA) means the Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or the Federal Water Pollution Control Act Amendments of 1972) Pub.L.92-500, as amended by Pub.L. 95-217, Pub.L. 95-576, Pub.L. 96-483 and Pub.L. 97-117, 33 U.S.C. 1251 et. seq.).

2. "Accreditation" means the formal recognition by the department of a laboratory's competence wherein specific tests or types of tests can be accurately and successfully performed in compliance with all minimum requirements set forth in the regulations regarding laboratory accreditation.

3. "Administrator" means the Administrator of the U.S. Environmental Protection Agency, or an authorized representative.

4. "Applicable effluent standards and limitations" means all state and Federal effluent standards and limitations to which a discharge is subject under the Clean Water Act, including, but not limited to, effluent limitations, standards or performance, toxic effluent standards and prohibitions, and pretreatment standards.

5. "Applicable water quality standards" means all water quality standards to which a discharge is subject under the Clean Water Act.

6. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.

7. "Commercial Laboratory" means any laboratory that performs analyses or tests for third parties for a fee or other compensation, except those commercial laboratories accredited by the Department of Health and Hospitals in accordance with R.S.49:1001 et seq.

8. "Daily Discharge" means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in terms of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the sampling day. For pollutants with limitations expressed in other units of measurement, the daily discharge is calculated as the average measurement of the pollutant over the sampling day. Daily discharge determination of concentration made using a composite sample shall be the concentration of the composite sample. When grab samples are used, the daily discharge determination of concentration shall be arithmetic average (weighted by flow value) of all samples collected during that sampling day.

9. "Daily Maximum" discharge limitation means the highest allowable "daily discharge" during the calendar month.

10. "Director" means the U.S. Environmental Protection Agency Regional Administrator or an authorized representative.

11. "Environmental Protection Agency" means the U.S. Environmental Protection Agency.

12. "Grab sample" means an individual sample collected in less than 15 minutes.

13. "Industrial user" means a nondomestic discharger, as identified in 40 CFR 403, introducing pollutants to a publicly owned treatment works.

14. "LEQA" means the Louisiana Environmental Quality Act.

15. "Louisiana Pollutant Discharge Elimination System (LPDES)" means those portions of the Louisiana Environmental Quality Act and the Louisiana Water Control Law and all regulations promulgated under their authority which are deemed equivalent to the National Pollutant Discharge Elimination System (NPDES) under the Clean Water Act in accordance with Section 402 of the Clean Water Act and all applicable federal regulations.

16. "Monthly Average" (also known as Daily Average), other than for fecal coliform bacteria, discharge limitations means the highest allowable average of "daily discharge(s)" over a calendar month, calculated as the sum of all "daily discharge(s)" measured during a calendar month divided by the number of "daily discharge(s)" measured during that month. When the permit establishes monthly average concentration effluent limitations or conditions, and flow is measured as a continuous record, the monthly average concentration means the arithmetic average (weighted by flow) of all "daily discharge(s)" of concentration determined during the calendar month where C = daily discharge concentration, F = daily flow and n = number of daily samples; monthly average discharge =

$$\frac{C_1F_1 + C_2F_2 + \ldots + C_nF_n}{F_1 + F_2 + \ldots + F_n}$$

The monthly average for fecal coliform bacteria is the geometric mean of the values for all effluent samples collected during a calendar month.

17. "National Pollutant Discharge Elimination System" means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 318, 402, and 405 of the Clean Water Act.

18. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

19. "Sewage sludge" means the solids, residues, and precipitates separated from or created in sewage by the unit processes of a publicly owned treatment works. Sewage as used in this definition means any wastes, including wastes from humans, households, commercial establishments, industries, and storm water runoff, that are discharged to or otherwise enter a publicly owned treatment works.

20. "Treatment works" means any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage and industrial wastes of a liquid nature to implement Section 201 of the Clean Water Act, or necessary to recycle or reuse water at the most economical cost over the estimated life of the works, including intercepting sewers, sewage collection systems, pumping, power and other equipment, and their appurtenances, extension, improvement, remodeling, additions, and alterations thereof.

21. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

22. For fecal coliform bacteria, a sample consists of one effluent grab portion collected during a 24-hour period at peak loads.

23. The term "MGD" shall mean million gallons per day.

24. The term "mg/L" shall mean milligrams per liter or parts per million (ppm).

25. The term "µg/L" shall mean micrograms per liter or parts per billion (ppb).

26. "Weekly average", other than for fecal coliform bacteria, is the highest allowable arithmetic mean of the daily discharges over a calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week. The weekly average for fecal coliform bacteria is the geometric mean of the daily discharges over a calendar week.

27. "12-hour composite sample" consists of 12 effluent portions collected no closer together than one hour and composited according to flow. The daily sampling intervals shall include the highest flow periods.

28. "6-hour composite sample" consists of six effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) and composited according to flow.

29. "3-hour composite sample" consists of three effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) and composited according to flow.

30. "24-hour composite sample" consists of a minimum of 12 effluent portions collected at equal time intervals over the 24-hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24-hour period.